

## ***Comments related to Visitor Experience including Wilderness, Motors, Group Size, Trip Length, NPS, etc.***

### ***ID Statement\* Summary***

4	C	Professional guides provide an educational opportunity and safe river experience. Guides are more protective of the resource. Do not decrease availability of guided trips.
20	C	Manage the Colorado River as wilderness or at least potential wilderness.
20	S	Set a lower limit on commercial trip length to 5 days and 4 nights.
21	C	Guides knowledge and expertise were super. Guides have strong conservation skills and take care of the Canyon.
22	C	The river corridor is not a wilderness.
22	C	River trips are not as high quality as possible.
22	C	NPS patrols do not enhance guest's experience.
22	S	Use outfitter fees on a computer model to figure out launches that avoid crowding.
22	S	Encourage 7:1 ratio of guests to guides. Currently some are as high as 21:2.
22	S	Decrease trip size to 28 including guides.
22	C	NPS camp inspections should include interpretive talks to visitors.
34	I	Do guides provide adequate quality of education, interpretation and enforcement of minimum impact rules?
34	S	Survey guides to determine their interest in providing educational services to visitors. Survey visitors to determine their level of interest in interpretive services. Provide a NPS interpreter on commercial trips to allow guides to do other duties.
45	C	Do not require a NPS interpreter on trips; this would detract from the adventure. Provide interpretive training for guides.
90	S	Maintain group size for privates at 16. Reduce commercial group size to 25.
11	C	Do not change the current limits on trip length.
11	C	Outfitters allow a broader cross-section of the population access to the river. Outfitters have accountability for preserving the resource.
11	C	A wilderness experience for use of the Colorado River should be the goal for users and managers at Grand Canyon.
11	S	The ultimate trip would be to see no one else. In order to achieve this, the number of people and user days would have to be reduced.
11	C	Appreciate being one of the lucky who gets to go on a river trip, and tolerate the occasional crowding at attraction sites.
14	C	Include the Inner Canyon as wilderness under the Wilderness Act. Allow motor use to continue.
14	C	Reduce regulations to reflect wilderness philosophy. Implement self-policing methods to reduce law enforcement encounters. Guns should be for emergency only, minimize technology such as satellite phones.
14	I	Preservation of trip variety and personal attention for commercial passengers. There is a trend towards focus on big business and less on visitor experience.
14	S	Reduce the size and power of commercial outfitters and NPS regulators. Set a limit on the size of commercial permits to 5,000 user days. Throw out the prospectus process. Eliminate excess regulation: develop partnerships to ensure resource protection and visitor experience.
48	C	Further crowding and an increase in user days are unwanted. All types of use should be accounted for including science and NPS trips, and all users charged the basic impact fee.
48	S	Change the number of launches in the high use season from between 4-11 (present) to 6-7 with a 150 person cutoff. Increase spring/fall season to 2-4 launches/day and one winter launch per day. Balance impact of launches each day by use type, trip size and length. Maintain diversity but encourage more oar trips and longer motor trips. Don't decrease commercial user days.

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65	C	I am concerned at some of the suggested solutions for crowding such as standardizing launch lengths and launch dates. As it is now, the balance is about perfect between the quality of a wilderness experience and allowing as many people as possible access to the canyon.
65	S	Encourage longer trips for flexibility. Flexibility and diversity are the best tools to preserve the wilderness feel and the opportunity for quiet and solitude on the river. Educate the public about solitude/contacts.
64	C	There is crowding at attraction sites which reduces the quality of the visitor experience and is a stress on the resource ie multiple trailing.
64	S	No additional regulation of river traffic. Instead, educate commercial guides and private boaters to alleviate the problem. Encourage, rather than regulate, users to be flexible and considerate to avoid congestion.
64	C	Because of existing development such as Phantom Ranch, current visitor levels and motor use, the river corridor should not be designated as wilderness.
64	S	Remove the river corridor from consideration for wilderness or potential wilderness given development, current use and non-conforming uses (motors).
64	S	Reduce but do not eliminate the number of permits granted for fast trips. Reissue use for oar trips or 10 to 14 day motor trips. Half trips should be 6 to 7 days.
64	I	Reliance on motors contradicts the wilderness: fast trips, noise, odor and pollution. There is a loss of river's natural drift and rhythm.
64	I	The current allocation system encourages shorter, more profitable trips by allowing "double-dipping" of user days during exchanges. These degrade the visitor experience by limiting time for resource education or the full canyon experience. The current allocation ratio between commercial and private should not be changed.
64	S	Count exchanges as two use days instead of one and set minimum trip lengths of 4 days to Phantom and 3 days between Whitmore and Lake Mead. Do not change the current allocation ratio between commercial and private because guides provide an invaluable role in protecting resources and educating the public.
65	C	I strongly support the river being managed as "potential wilderness" even while motors continue to be the exception. This helps protect the experiential quality of the river and focus the NPS on its resources and not law enforcement.
11	S	Ensure that the outfitter's commitment to go to quiet motor technology is enforced.
14	C	Include the Inner Canyon as wilderness under the Wilderness Act. Allow motor use to continue.
50	C	Protecting the natural resources in the canyon is primary. The impact of recreation on the physical and biotic resource, the natural quiet and the human interaction in the canyon should be considered. Jet skis and trail bikes are out. The ratio and density of large trips should not degrade the quality of other trips by noise and overuse of
63	C	NPS needs to begin phasing out motors altogether to relieve the people pressure on the river, to counter adverse environmental effects, and to better promote the wilderness experience.
44	C	The park should abandon the historic user-day allocation: it confuses the scheduling of trips, it encourages the outfitter to do short trips which leads to more people in the canyon and at a lesser quality experience. Primary season user-day allocations have been exceeded in both commercial and private sectors.
44	S	Make a logical schedule that incorporates a variety of trip lengths launching each day throughout a common primary and secondary season for ALL USES. Use a computer simulation model to test the schedule and determine if # of contacts remains within the "Limits of Acceptable Change". All users abiding by a sound schedule will alleviate conflicts in the canyon.
44	I	Currently a private trip can show up with 1 to 16 people and have any length trip up to a maximum for that season. There is no way to predict their schedule to avoid crowding.
44	S	The trip length along with a date to pass Phantom must be an integral part of the schedule in order to make the schedule work. Long trips of 18-30 days should continue to be an option, but they must work within a given schedule.
44	I	The current maximum commercial trip size is too large (36 passengers and 6 crew).
44	S	Utilize sociological information to determine the maximum trip size for any trip. Count crew members, they also have an impact. All administrative trips (research, NPS, GTS) should remain within these limits and conform with the schedule.
44	C	The secondary season should continue to offer a trip with significantly less contacts than the primary season. This could happen over the winter season with one launch on a fixed day per week.
11	C	The increasing number of rules, regulations, law enforcement and technology are inconsistent with wilderness values and management, are largely unnecessary, and can negatively impact a visitor's experience.

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- 11 C Because of existing development such as Phantom Ranch, current visitor levels and motor use, the river corridor should not be designated as wilderness.
- 11 S Remove the river corridor from consideration for wilderness or potential wilderness given development, current use and non-conforming uses (motors).
- 11 I Current user day system actively encourages shorter trips, more exchanges and more crowding. A passenger exchange at Phantom or Whitmore should count as two user days, instead of one.
- 11 S Count exchanges as two user days as originally defined. Keep the goal of quality of experience and protection of resource; do not offer economic incentives for more broken trips and helicopter exchanges by counting exchanges as one user day. Keep the number of allocated user days to the outfitter the same while considering alternatives to the user day system such as allowing a fixed number of people launches\* for each company. No matter what system is used, do not consider guides as a part of the allocation...it would lead to a lower guide to passenger ratio.
- 14 I There is no data to support that standardizing trip lengths and type would reduce congestion on the river.
- 14 S Continue to promote a diversity of trip options, lengths, and types for greatest opportunity to avoid crowding. Use the GCNPS computer model for predicting and avoiding crowding for both commercial and private. Do not consider assigned camp sites.
- 14 C Eliminating layovers cannot be taken seriously. It is incongruent with a quality visitor experience. A Grand Canyon trip inherently requires spontaneity. Discourage layovers for more than one night at a time.
- 15 C Include the lower gorge below Diamond in the user day allocation. The race of commercials to get below Diamond is stupid and effects quality of visitors experience. Thanks for taking action on the upstream travel of jet skis at Separation.
- 18 I Too many boats are leaving Lees Ferry during the peak months. No minimum length and the user day encourages speed trip and leads to crowding at attraction sites.
- 18 S Only 20% of an annual quota should be used in one month. A minimum length of a trip should be set. Eliminate helicopter exchanges. Instead of user days, count as people. Reduce the number of research trips and allow them only off season.
- 65 I Congestion and crowding during summer months leads to lack of camps in some areas, not enough room to park boats at some attraction sites, and too many people at them.
- 65 S Do not increase private or commercial allocation. Allow commercial companies to launch more trips in the shoulder months and don't force user days into the pool until January 1st. Manage the river on a yearly basis - one season. Don't allow outfitters to use more than 20% of their allocation in any month and don't increase private launches during summer. Don't allow layovers at popular spots ie Nankoweap, Bass, Stone, Tapeats during high use season. Eliminate exchanges at Phantom during high use season to take pressure off camps between Hance and Phantom. Don't allow outfitters to use weekend launch dates left open by other companies. Don't allow motor boats to travel upstream above mile 247 or at least reserve the few camps for slow trips coming down river to mile 247.
- 15 C While encountering another group while on the river has an undeniable impact at some level, that experience is a very subjective thing. Attempts to mitigate perceived crowding should be carefully considered in light of other management priorities, ie public access.
- 15 S Quantify the impact of changes already made in the launch schedule of commercial trips on crowding. Collect objective information about past visitor's perceptions of crowding at attraction sites.
- 19 C Noise from commercial trips partying at campsites at night has been a problem. The people in charge aren't being responsible about maintaining quiet. Get rid of motors, also noise at Whitmore is a problem.
- 17 C Extend the no-motor period. Helicopter sound is an intrusion to our wilderness experience. Raise their ceiling more during the no-motor time. How can NPS manage GC as wilderness with motors? Let users know the experience will change between floating, camping, and hiking at attraction sites, it's not all a wilderness experience.
- 18 C The Colorado River deserves to be managed as Wilderness. Numbers in the canyon need to be reduced by encouraging river users to go to other less used rivers, by reducing the outfitters user days or spreading commercial trips out through spring and fall; make commercial passengers wait longer for commercial trip as private boaters do.
- 90 S Eliminate motor noise by requiring aircraft where they cannot be heard. Motor rigs should not be heard more than 25 yards away.
- 47 C The ratio of private to commercial is fair and reflects the percent of society that can only see the river by commercial means. Limit the number of private trips you can do in a year to two. Increase the number of user days during off season to spread out use and allow more people in the canyon, thus shortening the wait list. Allow eco-friendly motors for those who can't see the canyon any other way. The fees for private and commercial should be similar since the costs to the park are similar.

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- 11 C The current allocation system is working well and is more than fair to private trips. However, there is no reason to expand the opportunities of commercial companies to make shorter trips, which are not long enough for people to really see the canyon, create noise problems (helicopters) and congestion problems for hikers (if they walk out). If people don't have a week to see the canyon, then they simply don't have time to see the canyon.
- 11 C While encountering other groups on the river has an undeniable impact at some level, the magnitude of that impact is a subjective thing. Attempts to mitigate perceived crowding should be carefully considered in light of other important management priorities.
- 11 S Collect relevant data on crowding. Quantify the impact of changes currently made in the launch schedule of commercial trips. Collect objective information about past visitor's perceptions of crowding at attraction sites, then determine if a problem still exists and possible solutions.
- 23 C Exchanges allow many more people to experience a river trip by offering shorter, more diverse, more affordable trips.
- 23 I Despite widespread recognition of the incompatibility of motors with the concept of restoration of the natural quiet to the canyon, the NPS continues to allow practically unrestricted use of motors and generators on the river.
- 49 I Weekend loading of commercial launches, shortened trips, and commercial group size are primary causes of crowding at attraction sites.
- 49 S Impose uniform launch system with equal numbers of commercial and private. Group size limits for both is 16 with minimum 7 day motor and 14 day oar trips to Diamond.
- 49 C I challenge the planners to see the corridors between wilderness areas as potential wilderness; such corridors are necessary to return and sustain the wilderness in the Canyon. Unless silent, quiet motor technology is not consistent with wilderness. Let the outfitters and trip leaders manage the human interaction on and between trips.
- 49 C NPS needs to begin phasing out motors altogether to relieve the people pressure on the river, to counter adverse environmental effects, and to better promote the wilderness experience.
- 49 C National Parks invite visitors. Most people have a positive experience on the river even with perceived crowding. Extend the commercial and private primary season (more than one launch per day) to include the last two weeks of April and September.
- 18 C The river from Lees Ferry to Separation should be designated Wild & Scenic. The river corridor should not be designated Wilderness if motors have to be eliminated. Motorized craft provide a viable option for a broad section of the public wanting a river trip. All other possible areas of the park should be designated Wilderness.
- 18 I Crowding at some sites leads to many social problems and to a severe loss of any sense of remoteness or solitude.
- 18 S Allow the same number of launches everyday of the week with a maximum party size of sixteen. Do not prohibit layover days at any popular camping sites. Consider an adaptable plan that might require advance reservations for camping or layover days at sites still experiencing crowding.
- 30 I Aircraft over the Grand Canyon are noisy nd detract from the floater's and hiker's experience of communing with nature.
- 30 S Restrict flights over the canyon to flying higher than an altitude which can be heard from the river level or the rim. Minimize the number of flights to lessen the visual impact.
- 25 S Reduce the number of trips per day or stagger trip departures.
- 33 I The noise of motors in Grand Canyon destroys the wilderness experience.
- 33 S Ban use of motor boats in Grand Canyon or at least greatly restrict their use and require quieter motors. Same with aircraft overflights.
- 33 C National Parks should be run to make wilderness experiences more likely; they should not be run for the profit of individuals or corporations.
- 33 I Crowding on the river. Private launches have not changed use patterns and represent a fairly constant launch flow, but the shift in commercial weekend launches to include Thursdays made a noticeable decrease in crowding impact at major attraction sites. The current discrepancy between trip size limits is such that one full commercial trip equals two private trips...thus one commercial trip affects crowding twice as much as each private.
- 33 S Go to a uniform launch based system with a maximum head count per launch and minimum and maximum trip lengths depending on season. Trip size limit should be 16 for both commercial and private. Minimum trip lengths should be 7 days to Diamond for motor trips and 14 days to Diamond using oar power. Maximum trip length should be the same for all users and kept the same as the current private trip length per seasonal correction. It is important the NPS maintains the quality of wilderness experience for all river
- 42 C Extend the no-motor period. Helicopter sound is an intrusion to our wilderness experience. Raise their ceiling more during the no-motor time. How can NPS manage GC as wilderness with motors? Let users know the experience will change between floating, camping, and hiking at attraction sites, it's not all a wilderness experience.
- 46 C Various trip lengths should be allowed to accommodate groups/families trying to match schedules.

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47	C	Motors aren't allowed in most other wilderness areas, so why should non-motor users put up with motors in the canyon?
38	I	Crowding at popular camps and attraction sites along the river has become a big problem.
38	S	Limit the trip size to 16 people including crew for private and commercial trips Count guides and crew as part of user day allocation. Schedule launches to reduce contact between trips.
14	C	There is too much traffic in the river corridor in the summer month. Major attraction sites and frequently used campsites are deteriorating. The user days ought to be decreased for the sake of the Canyon and future generations who would like to visit it. This many people there at one time is hardly a wilderness experience.
14	S	Reduce commercial user days by 15-20%. User days could be bought from the outfitter from groups that work to preserve the Canyon as well as NPS. Trim user days from the larger companies with the most user days. The short motor trips have a great impact on the major attraction sites. Count the short trip user days as two for one to help counter the situation or limit the number of short trips per season. Since their user days tax the resource more, they should cost a little more.
16	I	The carrying capacity of the river needs to be reassessed.
16	S	Use modeling to determine launch scheduling so bunching does not occur, and increase in river days may increase. Collect data and reassess.
18	S	Distribute use through a high use season in conjunction with a minimum trip length of 14 days.
18	I	Peak-season overcrowding at major attraction sites along the river corridor with negative impact on wilderness experience.
18	S	Reduce number of users. Commercial use could be reduced or spread-out over longer season.
19	C	Without changes to use patterns in private launches, there was a notable decrease in crowding at attraction sites following shift in commercial weekend launches.
19	S	Use a uniform launch-based system that includes maximum size, and minimum and maximum trip lengths which vary by season.
19	S	Incorporate "queuing theory" computer modeling into launch system that monitors use at attraction sites.
19	S	Redistribute use across seasons, increasing commercial use in winter: 4 launches/day in April to Oct 15, 2 launches/day Oct 15 to Nov 15 and Jan 15 to March, 1 launch/day Nov 16 to Jan 15. This will preserve the wilderness experience.
19	S	Reduce number of fast motor trips. Eliminate use of motors on flat water.
38	C	Outfitters have a reverence for the canyon and environment. Outfitters provide a variety of trips.
38	I	There is a lack of relevant data on use patterns at attraction sites upon which to base decisions.
65	S	Reduce total number of commercial user days and science by 25,000 (at 5,000 per year). Increase trip lengths especially for motor trips.
66	S	Space launches so that the same number of trips and people launch every day.
15	I	Motorized vehicles in Grand Canyon are inappropriate and inconsistent with that Wilderness.
66	S	Institute launch management instead of user days. Limit trip size for all to 16. .
66	I	The Grand Canyon needs to get back to being natural without powerboats and aircraft.
66	S	No more motorized boats on the river.
15	C	Disallow motorized vehicles in the park along the river corridor except for medical emergencies.
67	C	Seek to increase the cultural diversity of river users. Being a good steward is not directly related to having money or knowing how to run a rapid. It is acquired when people experience GC first-hand.
66	C	Support longer minimum trip lengths especially for motor trips. Do not double dip on user days. Reduce commercial group size.
66	C	Increase education of privates and hikers who use river campsites.
38	C	Commercial operators have excellent techniques to preserve the environment

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67	I	The carrying capacity is at or over limits set by the resource conditions or crowding.
67	I	Current clustering of launches on weekends increases crowding and encounters.
67	S	Evenly distribute all launches over the week. Reduce maximum group size.
67	I	Exchanges create undo noise and confusion at Phantom and Whitmore
67	S	Eliminate exchanges
66	S	Space out launches, equal number of launches per day.
44	I	The NPS must manage as wilderness as stated in objectives and principles.
44	C	The problems in the system should be dealt with using the current total allocation of use.
44	S	Do not increase use levels. It would increase visitor contacts, congestion at attractions and camps. Examine carrying capacity through research.
44	I	At certain times there is noticeable crowding at attraction sites and competition for camps.
44	S	Extensive research into use patterns and social use of river areas, apply to computer model. Establish trip lengths, exchanges, and varied launch criteria.
44	I	Increasing regulations and outside regulatory agencies diminishes the flexibility and quality of trips.
44	S	Resource and education patrol, no evaluation patrols, establish guidelines not regulations. NPS or resource trips should use minimum tool.
44	I	Range of trips, costs, and opportunities are diluted by the sale of companies.
44	S	Reallocate days from sold companies for lower cost and educational trips. Special incentives for smaller companies. Cap size of companies, no shorter or faster trips.
49	C	Motor trips offer a viable alternative to oar powered trips. Without motor option, crowding would be overwhelming. Keep motors using quiet technology.
49	C	Jet ski use in the Canyon should not now or ever be permitted.
44	I	The current allocation/user-day system compromises the visitor experience by encouraging shorter, faster trips with multiple exchanges to maximize profit.
44	S	Move to a system based on number of people rather than user days. For each outfitter, the total current user days would be divided by average trip length -- this would be their total number of people or allocation.
44	S	Specify a min. trip length of 4 days to Phantom, 7 days to Whitmore and 8 days to Diamond or the Lake. Will add flexibility, result in less crowding. Allow only one exchange per trip, either at Phantom or Whitmore.
44	S	Move to a launch-based system where a given number of launches are allowed per day. Reduce group size to 25 for commercial trips (16 on private). Suggest two commercial and two private launches per day in primary season.
65	C	The carrying capacity has been exceeded. The resource is surviving but the visitor experience is suffering, especially at attraction sites.
66	I	Generator noise that can be heard at a significant distance, and diminishes the wilderness experience.
66	S	I realize it may be difficult, but ban motors. At least offer a non-motor period in the spring.
67	S	Eliminate all exchanges (at Phantom and Whitmore) and make full-length trip more affordable to the public.
39	I	Crowding at attraction sites promises to get worse with time and if total allocation is increased.
39	S	Set a formula to define crowding which should be different for each site and based on environmental impact, not peoples perceptions. Use computer modeling to limit the number ie rescheduling launches etc.
47	I	There are too many people using the river and too much noise.

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41	I	The noise of motorized watercraft destroys one of the great benefits of the Canyon, that of natural silence on the long pooled sections of the river. It also dilutes one of the purposes of a National Park, to "preserve it unimpaired"...
41	S	Motor craft should be prohibited on the free-flowing waters of the Canyon.
45	I	Protect the park's natural quiet and solitude, wilderness status and management. Without protection from development and pollutants, we could lose the most basic and essential qualities the Canyon has.
24	C	Maintain wilderness, ecological viability, and solitude experience to be true to the Wilderness Act. Eliminate use of motorized boats. Eliminate helicopter transport except in emergencies. Replace helicopter transport at Whitmore with non-mechanized form of transportation.
45	I	If visitation is increased, overcrowding at popular sites will be more disturbing to everyone.
45	S	Do not increase total allocation of user days. Eliminate exchanges at Phantom and Whitmore. Encourage longer trips. Educate users about alternative sites to visit and encourage communication on the river as to plans. Keep flexibility on the river.
45	I	Noise pollution from aircraft is inconsistent with the GMP's objective to protect natural quiet and solitude. Noise pollution directly affects visitors and eliminates natural quiet and solitude.
25	C	I do not care if motors can be made quieter. I want no motors or completely silent motors. Have one year motorized, another year non-motorized. No helicopters.
45	S	Retain commercial allocations and at least 12 companies in order to foster a diversity of experience offered for a variety of values and needs including different propulsion type, trip length, exchange points etc. Retain contractual incentives/requirements for outfitters to provide opportunity for persons with disabilities.
45	S	Drop the river from the proposed Wilderness area. Motors are necessary for flexibility to reduce contacts. Make motors quiet. Manage as a wilderness type experience for part of the year as it is now. Perhaps add as Wild & Scenic , with diversity of access, in trip length and propulsion type.
45	I	Perceived crowding at attraction sites. There is a crying need for data; need to look at flip side ie how often do visitors experience uncrowded conditions and solitude.
45	S	Retain motors. They provide flexibility to avoid trip build ups and reduce group contact. Lengthen trips by 1/2 day to give more flexibility. Limit outfitters to using no more than 25% of their allocation in any given month. Use computer modeling to design Lees Ferry departures to avoid conflicts.
45	S	Provide computer networking that can place small privates with other small privates who desire to do so. This will reduce the incidence of group contact, make more starts available to privates and may enhance safety in big rapids. Commercial group size of 36 means less campsite conflict, more choice of smaller camps with less impacts for privates, and less incidence of group contact.
45	C	No motor season (9/15 - 12/15) coupled with secondary allocation period starting 10/1 should remain unchanged. An increasing number of customers have discovered this time period and are choosing these times for a higher quality experience.
54	C	I have experienced a private trip driver impaired by alcohol, seen private kayakers get injured at Lava and rescued by motorized commercial raft, private trips washing and relieving themselves in the side canyons/water runoffs. In 15 years I have never observed a commercial boatmen engage in or permit any of the foregoing, instead imparting detailed attention to safety and environmental responsibilities.
11	C	The overwhelming majority of the public who desire a river experience also desire or require professional assistance. For this majority, the current system is working well. The current allotment of 70/30 is more than fair for private trips. However, there is no reason to expand the opportunity for commercial companies to make shorter trips which are not long enough for people to really see the Canyon, create noise problems (helicopters) and congestion if people hike out.
11	C	The magnitude of impact from encountering another group on the river is a very subjective thing. Attempting to solve the perception by some that attraction sites are too crowded, could create other detrimental impacts elsewhere in the canyon and threaten the public's access to the River in general.
11	S	Collect relevant data regarding crowding and objective information about past visitor's perception of crowding before deciding if unacceptable levels have been reached.
88	C	Establish a minimum of 7 days for motor and 14 days for oar trips to reduce the impact of "week-end warriors" who destroy the tranquility and wilderness aspect for others.
14	I	There are too many people boating the river causing overcrowding at attraction sites, competition for camps, and overall resource damage, especially during summer months.
14	S	Reduce commercial group size to 16, or compromise to 25 including crew to increase quality experience and reduce trampling of plants and archaeological sites. Go to a launch based system for outfitters reducing total number of user days currently allotted. Organize launches by trip length to reduce encounters and reward longer trips with fewer exchanges.

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- 14 C The Grand Canyon and the river are becoming victims to a quantity versus quality struggle. GCNPS sets an example to the world when it makes river management decisions. Create a CRMP that is visionary and truly does the right thing. The Grand Canyon river trip must remain a wilderness experience.
- 26 C During the process of developing the CRMP, take profit out of the equation while considering first and foremost what is best for the Colorado River. Establish those criteria and then negotiate who gets to be on the river, for how long, motors or no motors. The Canyon with the sound of plane and motor boat traffic is still beautiful, but it has lost some of its wildness.
- 59 C The vast majority of private users have less experience with the Canyon than commercial users, are more likely to have difficulties with the required waste removal and safety practices. Most people who desire to use the Canyon are physically and mentally not capable of enjoying this resource without commercial guidance, whether through using an accompanying person on a private trip or a commercial river runner.
- 18 C To enhance the "wilderness experience" disallow passenger exchanges for commercial trips. If people want a shorter trip, there is the motor option. For private trips, keep the same allocation but shorten the maximum days to 14 for fewer contacts on and off river.
- 5 I The NPS knows what causes crowding problems on the river but refuses to do anything. Crowding at camps and attraction sites is directly attributable to weekend launch clustering of commercial users.
- 5 S Move towards 7 day motor and 13 day oar powered commercial trips with equal number of passengers launched on each day of the week. Shorten private trips to 13-16 days.
- 5 I Layover days frequently defeat attempts for on-river communication, re: at campsites since there is no way an upstream group can know a downstream group is laying over. This can lead to conflict especially in areas with few campsites. Layovers are also environmentally unsound: they increase beach use time and delay beach cleanup.
- 5 S Eliminate layovers at 5 to 10 high use campsites during the summer season.
- 5 S Ban use of motor boats in Grand Canyon or at least greatly restrict their use and require quieter motors. Same with aircraft overflights.
- 5 C NPS has done a great job allowing a variety of short and long trips, motors and oar powered trips, and allowing helicopter exchanges at Whitmore. Don't take away these public options, and don't consider eliminating motors in favor of all oar power.
- 15 I I see a huge contradiction between the lofty goals stated in the management objectives for the Colorado River and the day to day reality in the Park ie: "Protect the Park's natural quiet & solitude", but still allow tourist overflights and "Provide a wilderness river experience", but allow large groups in huge motor boats.
- 15 S Eliminate all overflight except for emergency or for scientific observation or make tourists wait 7 to 8 years and pay a yearly fee to wait as with the private boater system. Reduce commercial group size, boat size and eliminate all motors
- 18 I The current permit system encourages overcrowding on the river. There are too many humans on the river in summer and group sizes are too large, making it difficult to enjoy the peace and solitude of the canyon. It is often impossible to find a campsite because all are taken.
- 18 C Eliminate all commercial trips, rafting companies have had their time of easy money. Ban all motors and decrease maximum group size to 13.
- 29 C The trained boatmen made the river experience safe and rewarding for all participants no matter what physical infirmities were present.
- 20 I The main corridor and tributaries allow a feeling of true wilderness experience, except for the "bottle neck" effect at major attraction sites. These Wilderness pending areas are being impacted by 21,000+ people per year and it detracts from the wilderness experience.
- 20 S Make minimum trip length 14 or 15 days to minimize bottle neck effect. The Grand Canyon benefits from the amount of visitors presently in the Canyon but it is more important that these sites (attraction sites) be preserved in the corridor's Wilderness pending state.
- 60 C We rode on a commercial, motorized J-rig raft. My wife and I are 75 years old and could never have had such a beautiful, delightful, and safe trip any other way. Our guides were skilled, knowledgeable, fanatical about cleanliness and cordial.
- 60 I Large groups have a huge impact on the resources in the canyon. Motors trips are a key enabler of the large group sizes that impact resources and are themselves a major impact on (a potential) wilderness experience.
- 18 C There should be a maximum party size of 16. This should include guides and clients.
- 18 C On my recent 20 day rafting trip, I was shocked by the amount of motor boats we encountered. Motor boats adversely affect the ecology of the Canyon and introduce more traffic in a limited 280 mile wilderness. The noise and fumes of motors cannot be ignored. My group of 16 encountered herds of motorists at attraction sites...too crowded.



**ID Statement\* Summary**

- 18 S The use of motors should be restricted to above or below the Grand Canyon. This would preserve the integrity of the Canyon and improve the wilderness experience. Convert commercial motor companies to paddle/oar trips.
- 19 C Without the services of an outfitter we would have been unable to experience the Grand Canyon as vividly and completely as we did. Licensed river outfitters, with their high standards of safety and regard for ecology do more for the protection of the Colorado River environment than any person, publication, or thing that we have yet to experience. Allow outfitters to continue their operations.
- 10 C I prefer to see little changed in the current plan and no change in the allocation of numbers between outfitters and privates. I would not like to see more than the current 22,000 passengers allowed to use the river corridor. Outfitters minimally impact the area and serve as educators & preservationists. Also, they are well trained and safe.
- 13 S Prohibit motors in the river corridor. A compromise may be to reverse the current split - motors could be used from 9/15 - 12/15, but not the rest of the year. The Wilderness Act emphasizes non-motorized use, and should be respected in the CRMP update. Limit the group size for all trips. Emphasize policies limiting trail building and scout routes that diminish the wilderness experience.
- 37 I The current user day system rewards the fastest possible trips, with the most possible exchanges. This hurts the once in a lifetime commercial passenger and everybody else because boatmen have no flexibility to adjust for other trips or unforeseen circumstances.
- 51 C While there might be times when other groups are encountered, there is enough space for everyone to enjoy these areas. Conversations about campsites have been cordial and I never felt any group had to settle for second best. The river shoreline is cleaner due to fire pans than previous trips.
- 64 C In general the river is still a good wilderness experience but in certain times and areas it is very crowded. This is because commercial parties are too large and with the speed of motor travel, they pile up on each other, especially when they launch and take out the same time.
- 64 S Less people. Spread people out more. No multiple commercial launches. Ban motorized use, this is supposed to be a wilderness. The point is to protect the resource, not just the businesses living off the resource.
- 15 C Schedule some of the large 6-8 day motor trips in early summer with fewer of the 13-14 day trips during this time. Schedule them in late summer or September and stagger dory and longer raft trips for 23-24 days at a time to give them the benefit of the wilderness experience. This should allow more spread in the use of campsites.
- 15 C All trips in the canyon should use oars or paddles as the primary propulsion for the distance. The loss of motor noise adds to the natural experience of water, wind, rock and animal sounds. At least compromise and limit the use of motors for the quiet of all.
- 15 C Noise from overflights is deafening inside the Canyon.
- 20 C A number of times our commercial trip has bypassed one or two of the attraction sites due to the fact of crowding. The control should be based on what you see when you get there, and bypass at the discretion of the trip leader. Monitor attraction sites. Ask passengers if it was worthwhile even if it was crowded.
- 20 C Reduce environmental impact to the lower gorge by not allowing upstream travel above the park boundary near Pierce Ferry.
- 14 C Get tough on when commercial companies launch. No more bunching up on weekends, this will help some of the crowding problems.
- 68 C Please consider the importance of assuring admittance to the Grand Canyon to ALL persons, of all ages and abilities. On my "River of Dreams" trip last spring, the wonderful commercial river guides never made me feel like a nuisance or bother, but always helped me see the many fascinating aspects of the Canyon. My confidence and motivation were incalculably elevated by this experience.
- 68 C I was injured in a skiing accident which resulted in brain stem and spine damage. Participating on the River of Dreams trip was a fantastic success. Do all you can for the continuation of the River of Dreams program.
- 68 C I was privileged to be a member of a River of Dreams trip. It provided a challenge which made me happy to accomplish. Continue to provide and improve this service. Please consider the population of people with disabilities.
- 70 C The most important issues are preservation of the Canyon, equal and fair access for all users, and enhancement of the Wilderness experience. The Canyon is a public resource which should be managed for the benefit of all the public, not just the outfitters.
- 70 C To preserve and protect the river and the wilderness experience, the use of any and all mechanized travel in the river corridor should be phased out. Aircraft and motor boats do not belong in the river corridor.
- 70 C My trip with the River of Dreams was revealing in many ways: it was inspiring to see other handicapped passengers cope very well. And what a joy to see a team of volunteers, people from all walks of life, work together. Access for people who can handle the slight inconveniences should certainly be allowed and encouraged.

**ID Statement\* Summary**

69	I	Park visitors should be allowed to have an experience with minimal amount of mechanized intrusion. The overflights are the most consistent source of disruption facing the Park and it's guests.
69	S	Grand Canyon NP should ban any commercial tour aircraft activity within its boundaries.
67	C	We need to make the Colorado River experience a true feeling of wilderness which is going to be practically impossible May - Sept 15 because of the "grandfathered-in" motor outfitters.
67	S	Establish a season for river runners where they can experience true wilderness, Oct 1 - April 30 where there were no motor trips allowed and restricted overflights. Offer incentives to people who choose their trips during this period ie cheaper rates. Spread out launch dates to accommodate the wilderness feel.
67	I	There is over-crowding at popular attraction sites on the river during the summer season.
67	S	Create incentives for private and commercial trips to choose more off season dates. Do fewer or no exchanges at Phantom and Whitmore. Offer longer trips ie 14 or more days for oar trips and 8 or more days for motor trips.
69	C	I don't know if it is the insults to the body (that define the special populations) that make them especially attendant to the spirit present in the wilderness. Whatever it is, I hope your decision making continues to consider persons with disabilities. They significantly add to the variety of seeing in the Grand Canyon, to the diversity of spirits meeting spirit. This matters.
36	C	Manage the river corridor for quiet, but not necessarily eliminating motors. Prohibit noise from generators except for emergency needs, not convenience.
36	I	Reduce and work towards the goal of eliminating motors.
70	C	I strongly support access to the Colorado River for people with significant disabilities. I participated in a trip with at risk teens and kids with significant disabilities. It was terrific, enlightening, enriching, well organized, safe, and fun.
70	C	The River of Dreams rafting trip changed my life. Please continue to allow the Grand Canyon and Colorado River to be accessible to people with disabilities to have primitive recreational activities consistent with wilderness experiences.
68	I	The Grand Canyon needs to get back to being natural without powerboats and aircraft.
68	S	No more motorized boats on the river.
68	C	Crowding should be addressed through better managing not just of the number of launches per day, but the number of people in the party and the trip length. Encourage longer trips and discourage passenger exchanges to provide more flexibility in schedules and enhance overall visitor experience. If this isn't effective, then reduce total number of user days.
28	C	Most of the congestion at attraction sites and competition for camps occur in the peak months of June, July, and August. To help spread out commercial use over the summer season, extend motor use to Oct. 1. Require that no outfitter use more than 22% of their allocation in any given month. Have outfitters standardize their main schedule of trips after computer modeling input.
70	C	Travel by boat through the Canyon is one of the greatest wilderness experiences in the lower 48 states. Our children and their children should be able to have this experience. This experience is being threatened by increased public demand for boat and helicopter trips in and over the canyon.
70	C	Wilderness protection for the river offers the best chance that the Canyon will retain its primeval character and influence.
71	C	River Rampage is an amazing program that allows special needs and youth at risk the opportunity to float down the river and experience mother nature at her premium. Educating all people is the most effective method of preservation. Please make this river accessible to everyone - the lessons these kids learn they take back to their
71	C	Regulations limiting group size to 16 for privates and 36 for commercials are ridiculous. The fundamental measurement for impact on the river is the user day. The impact of a large river party on a short trip is similar to that of a small group on a long trip. Impose a limit of 288 user days per trip for private & commercial alike and let them run their trip as they see fit.
71	C	Commercial exchanges need to be stopped simply because of the financial incentive it provides. It encourages helicopter noise in the canyon.
71	C	On a special populations trip on the Colorado River, the participants, the attendants, the support staff and the guides came away with a much wider scope of vision and incredibly larger hearts. The commercial companies were most excellent...very professional, protective of the natural environment, safety oriented and great entertainers and

**ID Statement\* Summary**

71	C	My experience this year was much more positive than previous due to a lack of air flights everywhere. The commercial companies we encountered were helpful and considerate. River ranger staff were courteous, helpful and business like. We observed Peregrine Falcons and bighorn sheep, in 1981 we saw neither.
71	C	A Grand Canyon raft trip is of the highest order of Wilderness experience, but one encounters too many motor boats for this to occur.
69	C	I am a blind individual who has had the opportunity to enjoy the unique wilderness experience of the Colorado River. I know what a profound impact the experience made on my life. Because blind and visually impaired are a small minority, our access to outdoor recreation is often overlooked. Include in the CRMP the right of access for blind/visually impaired and provide for the assistance of a sighted person. Encourage outfitters to satisfy the needs of the blind and visually impaired patron.
14	C	A person cannot begin to comprehend the Canyon/river without combining rafting with hiking in or out and viewing the river from the rim. Do not set limits on the duration of days a trip must last. Keep the 21 days in primary season and 30 in secondary season. The shorter full and half river trip's allow more people the opportunity to explore this national treasure.
14	C	A wilderness experience on the river is everyone's goal but in reality we have to make compromises in order to protect the canyon and river and control trampling, over crowding, etc.
14	S	Do not increase or decrease the number of people on the river.
14	C	People should enjoy the river trip knowing how fortunate they are to have it near perfect while at the same time allowing large numbers of rafters. Share experiences with others knowing that you are all among the few lucky ones to be at such a magic spot.
14	C	A person cannot begin to comprehend the Canyon/River without combining rafting with hiking in or out and viewing the river from the rim. Do not set limits on trip length. Keep 21 days in primary and 30 in secondary season. The shorter full and half river trips allow more people the opportunity to explore this national treasure.
14	C	A wilderness experience on the river is a goal, but in reality we have to make compromises in order to protect the canyon and river and control trampling, overcrowding, etc.
14	S	Do not increase or decrease the number of people on the river.
14	C	People should enjoy the river trip knowing how fortunate they are to have it near perfect while at the same time allowing large numbers of rafters. Share experiences with others knowing that you are all among the few lucky ones to be at such a magical spot.
68	C	There has been a noticeable decrease in crowding at major attraction sites following the shift in commercial weekend launches to include Thursday. The current trip size limits of 36 plus 6 crew for commercial and 16 for privates means that fewer commercial trips at one given attraction site affect crowding twice as much as each private trip
68	S	Go to a uniform launch based system that includes a maximum head count of 16 per launch, a minimum of 7 days to Diamond Creek using motor support and 14 days to Diamond using oar power. Maximum trip lengths should apply to all users equally which may vary with seasons. It is important that the quality of wilderness is insured. Use computer modeling to monitor crowding at attraction sites and allow for modification of launch schedules to adjust for this.
10	S	I realize it may be difficult, but ban motors. At least offer a non-motor period in the spring.
18	S	To preserve the resource, minimize crowding, and to strengthen the principles of wilderness management, the maximum party size should total 16 with no increase in the total allowable uses. Maximum trip length and number of launches should continue to vary across seasons.
73	I	Maintaining a diversity of river experiences to a more diverse public.
73	S	Increase private and commercial launch offerings for educational trips, lower income groups, etc. Allow private groups to hire guides. No need to maintain the diversity offered by motor trips, as that experience comes with too high a price on the experience of others, and eliminating motors will not impact the range of people who can experience the Canyon because everyone capable of going down the river is capable of being on an oar trip.

## *Comments related to the Use of Motors and Aircraft*

### *ID Statement\* Summary*

3	I	Wilderness values are being degraded by noise.
3	S	Eliminate motor noise by requiring aircraft where they cannot be heard. Motor rigs should not be heard more than 25 yards away.
22	C	Spend Colorado River Fund on quiet motor technology.
34	I	Should use of motorized rafts be reduced or eliminated?
34	S	Reduce but do not eliminate the number of permits granted for fast trips. Reissue use for oar trips or 10 to 14 day motor trips. Half trips should be 6 to 7 days.
34	I	Reliance on motors contradicts the wilderness: fast trips, noise, odor and pollution. There is a loss of river's natural drift and rhythm.
34	S	Reduce number of fast motor trips. Eliminate use of motors on flat water.
45	C	Eliminate motorized equipment within the canyon wall including motorized rafts and helicopters.
47	I	Gas-powered access is not allowed in most other wilderness areas, why should others have to put up with it?
47	S	Allow no motors in or over the canyon. Plane flights are okay if you can't hear them.
90	I	Should use of motorized rafts be reduced or eliminated?
11	C	Motors make the canyon available to a larger portion of the population but the outfitter's motors should be monitored for noise and pollution.
11	S	Ensure that the outfitter's commitment to go to quiet motor technology is enforced.
14	C	Include the Inner Canyon as wilderness under the Wilderness Act. Allow motor use to continue.
64	C	Because of existing development such as Phantom Ranch, current visitor levels and motor use, the river corridor should not be designated as wilderness.
64	S	Remove the river corridor from consideration for wilderness or potential wilderness given development, current use and non-conforming uses (motors).
64	S	Reduce but do not eliminate the number of permits granted for fast trips. Reissue use for oar trips or 10 to 14 day motor trips. Half trips should be 6 to 7 days.
64	I	Reliance on motors contradicts the wilderness: fast trips, noise, odor and pollution. There is a loss of river's natural drift and rhythm.
47	S	Allow no motors in or over the canyon. Plane flights are okay if you can't hear them.
11	C	Motors make the canyon available to a larger portion of the population but the outfitter's motors should be monitored for noise and pollution.
65	C	The ratio of private to commercial is fair and reflects the percent of society that can only see the river by commercial means. Limit the number of private trips you can do in a year to two. Increase the number of user days during off season to spread out use and allow more people in the canyon, thus shortening the wait list. Allow eco-friendly motors for those who can't see the canyon any other way. The fees for private and commercial should be similar since the costs to the park are similar.
11	S	Ensure that the outfitter's commitment to go to quiet motor technology is enforced.
14	C	Include the Inner Canyon as wilderness under the Wilderness Act. Allow motor use to continue.
64	I	Despite widespread recognition of the incompatibility of motors with the concept of restoration of the natural quiet to the canyon, the NPS continues to allow practically unrestricted use of motors and generators on the river.
64	S	Motor boats and generators must be phased out (ie 10% per year). In the meantime, expand periods of non-motor use throughout the year.
50	C	Protecting the natural resources in the canyon is primary. The impact of recreation on the physical and biotic resource, the natural quiet and the human interaction in the canyon should be considered. Jet skis and trail bikes are out. The ratio and density of large trips should not degrade the quality of other trips by noise and overuse of
50	C	I challenge the planners to see the corridors between wilderness areas as potential wilderness; such corridors are necessary to return and sustain the wilderness in the Canyon. Unless silent, quiet motor technology is not consistent with wilderness. Let the outfitters and trip leaders manage the human interaction on and between trips.

\* I = Issue, S = Solution, C = Comment

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63	C	NPS needs to begin phasing out motors altogether to relieve the people pressure on the river, to counter adverse environmental effects, and to better promote the wilderness experience.
11	C	Because of existing development such as Phantom Ranch, current visitor levels and motor use, the river corridor should not be designated as wilderness.
11	S	Remove the river corridor from consideration for wilderness or potential wilderness given development, current use and non-conforming uses (motors).
14	C	The river from Lees Ferry to Separation should be designated Wild & Scenic. The river corridor should not be designated Wilderness if motors have to be eliminated. Motorized craft provide a viable option for a broad section of the public wanting a river trip. All other possible areas of the park should be designated Wilderness.
11	I	Wilderness values are being degraded by noise.
15	C	Include the lower gorge below Diamond in the user day allocation. The race of commercials to get below Diamond is stupid and effects quality of visitors experience. Thanks for taking action on the upstream travel of jet skis at Separation.
18	C	We should not make the river a wilderness. It would only renew the motors/oars controversy. There is a conflict of interest for NPS employees to write articles and push for wilderness when their main objective is to get motors off the river.
19	C	I hope to get as many people as I can to send letters supporting "re-opening" of the river to hard hulled vessels from Separation Canyon to Diamond Creek.
19	C	Noise from commercial trips partying at campsites at night has been a problem. The people in charge aren't being responsible about maintaining quiet. Get rid of motors, also noise at Whitmore is a problem.
17	C	Extend the no-motor period. Helicopter sound is an intrusion to our wilderness experience. Raise their ceiling more during the no-motor time. How can NPS manage GC as wilderness with motors? Let users know the experience will change between floating, camping, and hiking at attraction sites, it's not all a wilderness experience.
90	S	Eliminate motor noise by requiring aircraft where they cannot be heard. Motor rigs should not be heard more than 25 yards away.
90	C	I do not have a problem with helicopter exchanges at Whitmore or motors on the river. Having a no-motor season is good and should be quiet as possible.
47	C	Motors aren't allowed in most other wilderness areas, so why should non-motor users put up with motors in the canyon?
47	S	Allow no motors in or over the canyon. Aircraft are OK if they are high enough to not be heard in the wilderness area.
47	C	The ratio of private to commercial is fair and reflects the percent of society that can only see the river by commercial means. Limit the number of private trips you can do in a year to two. Increase the number of user days during off season to spread out use and allow more people in the canyon, thus shortening the wait list. Allow eco-friendly motors for those who can't see the canyon any other way. The fees for private and commercial should be similar since the costs to the park are similar.
23	I	Despite widespread recognition of the incompatibility of motors with the concept of restoration of the natural quiet to the canyon, the NPS continues to allow practically unrestricted use of motors and generators on the river.
15	I	Motorized vehicles in Grand Canyon are inappropriate and inconsistent with that Wilderness.
15	C	Disallow motorized vehicles in the park along the river corridor except for medical emergencies.
49	S	Motor boats and generators must be phased out (ie 10% per year). In the meantime, expand periods of non-motor use throughout the year.
49	C	Protecting the natural resources in the canyon is primary. The impact of recreation on the physical and biotic resource, the natural quiet and the human interaction in the canyon should be considered. Jet skis and trail bikes are out. The ratio and density of large trips should not degrade the quality of other trips by noise and overuse of
49	C	I challenge the planners to see the corridors between wilderness areas as potential wilderness; such corridors are necessary to return and sustain the wilderness in the Canyon. Unless silent, quiet motor technology is not consistent with wilderness. Let the outfitters and trip leaders manage the human interaction on and between trips.
49	C	NPS needs to begin phasing out motors altogether to relieve the people pressure on the river, to counter adverse environmental effects, and to better promote the wilderness experience.
49	C	Motor trips offer a viable alternative to oar powered trips. Without motor option, crowding would be overwhelming. Keep motors using quiet technology.
49	C	Jet ski use in the Canyon should not now or ever be permitted.

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18	C	The river from Lees Ferry to Separation should be designated Wild & Scenic. The river corridor should not be designated Wilderness if motors have to be eliminated. Motorized craft provide a viable option for a broad section of the public wanting a river trip. All other possible areas of the park should be designated Wilderness.
18	S	Eliminate helicopter exchanges at Whitmore. Limit commercial trip size to 16 people, same as private. Allocate user days 50/50 between commercial and private and charge the same per head fee. Eliminate motors on the river corridor.
33	C	Include the lower gorge below Diamond in the user day allocation. The race of commercials to get below Diamond is stupid and effects quality of visitors experience. Thanks for taking action on the upstream travel of jet skis at Separation.
24	C	We should not make the river a wilderness. It would only renew the motors/oars controversy. There is a conflict of interest for NPS employees to write articles and push for wilderness when their main objective is to get motors off the river.
25	C	I do not care if motors can be made quieter. I want no motors or completely silent motors. Have one year motorized, another year non-motorized. No helicopters.
33	I	The noise of motors in Grand Canyon destroys the wilderness experience.
33	S	Ban use of motor boats in Grand Canyon or at least greatly restrict their use and require quieter motors. Same with aircraft overflights.
33	C	I hope to get as many people as I can to send letters supporting "re-opening" of the river to hard hulled vessels from Separation Canyon to Diamond Creek.
33	C	Noise from commercial trips partying at campsites at night has been a problem. The people in charge aren't being responsible about maintaining quiet. Get rid of motors, also noise at Whitmore is a problem.
42	C	Extend the no-motor period. Helicopter sound is an intrusion to our wilderness experience. Raise their ceiling more during the no-motor time. How can NPS manage GC as wilderness with motors? Let users know the experience will change between floating, camping, and hiking at attraction sites, it's not all a wilderness experience.
42	C	Access to the Colorado River should be available to people who count on outfitters to supply expertise, equipment, and support. This includes helicopters to get us in and out and motorized trips.
33	I	Large groups have a huge impact on the resources in the canyon. Motors trips are a key enabler of the large group sizes that impact resources and are themselves a major impact on (a potential) wilderness experience.
33	S	Prohibit motors in the river corridor. A compromise may be to reverse the current split - motors could be used from 9/15 - 12/15, but not the rest of the year. The Wilderness Act emphasizes non-motorized use, and should be respected in the CRMP update. Limit the group size for all trips. Emphasize policies limiting trail building and scout routes that diminish the wilderness experience.
46	C	Motors should be allowed to facilitate shorter trips. Quieter motors can be obtained if noise is a problem for others.
47	C	Motors aren't allowed in most other wilderness areas, so why should non-motor users put up with motors in the canyon?
54	C	Reduce environmental impact to the lower gorge by not allowing upstream travel above the park boundary near Pierce Ferry.
45	S	Allow no motors in or over the canyon. Aircraft are OK if they are high enough to not be heard in the wilderness area.
45	C	Manage the river corridor for quiet, but not necessarily eliminating motors. Prohibit noise from generators except for emergency needs, not convenience.
50	I	Reduce and work towards the goal of eliminating motors.
50	S	Restrict motor season in the spring and gradually lengthen the motor restricted season until goal of elimination met. As an alternative, have summer the only motor season.
19	S	Reduce number of fast motor trips. Eliminate use of motors on flat water.
19	C	Eliminate motorized equipment within the canyon wall including motorized rafts and helicopters.
15	I	Motorized vehicles in Grand Canyon are inappropriate and inconsistent with that Wilderness.
66	I	The Grand Canyon needs to get back to being natural without powerboats and aircraft.
66	S	No more motorized boats on the river.

\* I = Issue, S = Solution, C = Comment

***ID Statement\* Summary***

65	S	Lower the decibel levels of motors.
44	S	Pursue wilderness status as part of the CRMP with input from the public. Grandfather in the use of motors for potential wilderness status for the river corridor.
49	C	Motor trips offer a viable alternative to oar powered trips. Without motor option, crowding would be overwhelming. Keep motors using quiet technology.
49	C	Jet ski use in the Canyon should not now or ever be permitted.
66	S	I realize it may be difficult, but ban motors. At least offer a non-motor period in the spring.
39	C	GCNP sees tremendous adverse impact from the use of motors both in the air and on the river. NPS formerly wanted a ban on motors and a true "Wilderness" designation for the Park which was sabotaged by the Hatch Amendment and political pressures.
39	S	Get true Wilderness designation for Grand Canyon. It is not the taxpayer's problem that a motor-based industry has arisen on the river, nor is it the taxpayer's problem to assure commercial operators a profit.
47	S	Limit people on private and commercial trips. Use a lottery for private trips and cap with lottery on commercial trips. Limit or end overflights and prohibit motors.
41	I	The noise of motorized watercraft destroys one of the great benefits of the Canyon, that of natural silence on the long pooled sections of the river. It also dilutes one of the purposes of a National Park, to "preserve it unimpaired"...
41	S	Motor craft should be prohibited on the free-flowing waters of the Canyon.
24	C	Maintain wilderness, ecological viability, and solitude experience to be true to the Wilderness Act. Eliminate use of motorized boats. Eliminate helicopter transport except in emergencies. Replace helicopter transport at Whitmore with non-mechanized form of transportation.
25	C	I do not care if motors can be made quieter. I want no motors or completely silent motors. Have one year motorized, another year non-motorized. No helicopters.
45	I	Proposed Wilderness on the river needs legislative resolution. "Defacto" Wilderness by being proposed decade after decade is an abuse of the Wilderness Act.
45	S	Drop the river from the proposed Wilderness area. Motors are necessary for flexibility to reduce contacts. Make motors quiet. Manage as a wilderness type experience for part of the year as it is now. Perhaps add as Wild & Scenic , with diversity of access, in trip length and propulsion type.
45	S	Retain motors. They provide flexibility to avoid trip build ups and reduce group contact. Lengthen trips by 1/2 day to give more flexibility. Limit outfitters to using no more than 25% of their allocation in any given month. Use computer modeling to design Lees Ferry departures to avoid conflicts.
48	C	Wilderness is a progressive idea. Whether we are talking about aircraft noise, outboard motor noise or what is appropriate to do in the canyon, wilderness is something we need to work towards rather than just fiat.
54	C	My experience on the river leads me to the strong conclusion that environmental and safety concerns, together with an effort to maximize undamaging exposure of a reasonable number of citizens to this experience, dictate no change in the ratio of private to commercial permits. Proof of private parties' experience and knowledge of the environmental regulations in the Canyon should be required. Motorized trips are critical to the vast majority of people being able to "run the Canyon".
15	C	The Grand Canyon is arguably the most beautiful and pristine wilderness on the face of the earth. Why are motor rigs allowed in the canyon wilderness? This seems like pandering to commercial interests. The introduction of the Condor and the ban on scenic helicopter flights over the inner canyon corridor are steps towards maintaining the canyon as wilderness and should be applauded. Why allow motor rigs to destroy the tranquility of the canyon?
88	I	The noise of motors in Grand Canyon destroys the wilderness experience.
14	I	There is rampant schizophrenia and conflict regarding wilderness management and motor use within the Park Service and the boating community.
14	S	Park Service divisions should unite and accept their responsibility to manage proposed wilderness as such, as required by law. Wilderness emphasis would not preclude motors, however, NPS should use minimum tool criteria on ALL Park trips. A lower key government presence would promote better relations with other non-motorized groups. Commercial outfitters can use motors, but they must convert to quiet/non-polluting technology. They must compromise and agree to other wilderness goals such as reducing
18	C	Allow only oar trips rather than motor.

***ID Statement\* Summary***

- 26 S Pursue Wilderness designation for the Colorado River as priority in the CRMP. The issue of incompatibility of motor use in wilderness can be approached with a spectrum of possibilities: Grandfather in existing use of commercial motor use; Allow existing commercial motor use for next 10-20 years with a phase out to human powered craft only; Decrease the motor season to 3 months over the summer only; Get Congress to assist commercial motor companies in the change over from motor to oar/paddle.
- 17 C Encourage or mandate the use of cleaner, more quiet outboard motors to reduce impact of man on the river. Enforce "Take only pictures, leave only footprints."
- 5 S Ban use of motor boats in Grand Canyon or at least greatly restrict their use and require quieter motors. Same with aircraft overflights.
- 5 C NPS has done a great job allowing a variety of short and long trips, motors and oar powered trips, and allowing helicopters exchanges at Whitmore. Don't take away these public options, and don't consider eliminating motors in favor of all oar power.
- 19 C Access to the Colorado River should be available to people who count on outfitters to supply expertise, equipment, and support. This includes helicopters to get us in and out and motorized trips.
- 20 C Floating down the Grand Canyon is an experience in solitude and tranquility. Noise from motors should be eliminated. Aircraft and other motor noise is not consistent with managing the area as a wilderness. Personal watercraft are infiltrating the Canyon from Lake Mead.
- 20 S Reduce motor use. Manage the backcountry as a primitive wilderness. Be true to the Wilderness Act which emphasizes non-motorized use and enunciates the minimum tool concept.
- 60 C I can understand concern over motors as to pollution, I feel certain improved technology could mitigate this problem. A good outboard motor in skillful hands is absolutely essential on the large J-rigs. You should not compromise safety.
- 60 I Large groups have a huge impact on the resources in the canyon. Motors trips are a key enabler of the large group sizes that impact resources and are themselves a major impact on (a potential) wilderness experience.
- 18 C On my recent 20 day rafting trip, I was shocked by the amount of motor boats we encountered. Motor boats adversely affect the ecology of the Canyon and introduce more traffic in a limited 280 mile wilderness. The noise and fumes of motors cannot be ignored. My group of 16 encountered herds of motorists at attraction sites...too crowded.
- 18 S The use of motors should be restricted to above or below the Grand Canyon. This would preserve the integrity of the Canyon and improve the wilderness experience. Convert commercial motor companies to paddle/oar trips.
- 13 C Jet boaters, wave runners, and other craft originating from Lake Mead should not be allowed to camp in Grand Canyon National Park unless they also fill out backcountry permits, pay the fees, and treat the place accordingly.
- 13 S Prohibit motors in the river corridor. A compromise may be to reverse the current split - motors could be used from 9/15 - 12/15, but not the rest of the year. The Wilderness Act emphasizes non-motorized use, and should be respected in the CRMP update. Limit the group size for all trips. Emphasize policies limiting trail building and scout routes that diminish the wilderness experience.
- 18 I Most national parks have a core area, an area of most pristine wilderness. In the Grand Canyon the river is the core. It is also the corridor of most use and abuse by humans. The number of motor boats on the river are jeopardizing the health of the environment and the wilderness experience.
- 18 S Guides who respect and love the river will continue to run the river without the aid of petroleum. Reduce the numbers of motor-rigs year by year, making the full transition to human powered boats by the end of ten years.
- 28 C Motors should be allowed to facilitate shorter trips. Quieter motors can be obtained if noise is a problem for others.
- 37 C Wilderness designation for Grand Canyon is philosophically appropriate but politically almost impossible to attain. You can't ban motors and keep the same use levels without making the place a zoo.
- 37 S Stick with the current plan: peak season is "sacrificial" and shoulder season offers a more wilderness-like setting. Allow quiet motor use 4 months a year at peak season. For 8 months, manage the entire canyon as wilderness in every regard.
- 51 C It is very important that both commercial and private groups have continued access to the Colorado River. There is a place for motor trips...they allow a shorter duration trip. I have not been distracted by motor noise from planes or the raft. I would hate to see further limitations on commercial trips since most people do not have the equipment, skill, or time to devote to arranging their own private trip.
- 64 C In general the river is still a good wilderness experience but in certain times and areas it is very crowded. This is because commercial parties are too large and with the speed of motor travel, they pile up on each other, especially when they launch and take out the same time.



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64	S	Less people. Spread people out more. No multiple commercial launches. Ban motorized use, .this is supposed to be a wilderness. The point is to protect the resource, not just the businesses living off the resource.
64	C	Overflight noise can be heard at least half of the 285 mile run, in some areas they are incessant and intolerable. Overflight corridors should be 10% of what they are now. There is no reason for motorized river traffic in a Wilderness area. Even if we don't have the political will to ban motors, there is no excuse for not requiring quiet and clean 4-stroke engines.
15	C	All trips in the canyon should use oars or paddles as the primary propulsion for the distance. The loss of motor noise adds to the natural experience of water, wind, rock and animal sounds. At least compromise and limit the use of motors for the quiet of all.
20	C	My last trip in June 1997, the trip leader had two 4 cycle engines. There was a noticeable difference in noise level and pollution.
20	C	Reduce environmental impact to the lower gorge by not allowing upstream travel above the park boundary near Pierce Ferry.
2	C	Large motor boats move a lot of people, and seem to be conscious of the needs of non-motorized folks. Require 4 cycle motors. I have a huge problem with jet boat people (PWC's) coming up from Lake Mead. Wilderness and solitude were replaced with tremendous noise and discourteous boaters. Do not permit access to jet skis beyond the dead water inlet area to Lake Mead.
70	C	To preserve and protect the river and the wilderness experience, the use of any and all mechanized travel in the river corridor should be phased out. Aircraft and motor boats do not belong in the river corridor.
68	C	Maintain the current allocation level for commercial river companies. Most people do not have the equipment or experience to do their own trip. Cut back on some of the motor rigs or have companies buy much quieter motors.
67	C	We need to make the Colorado River experience a true feeling of wilderness which is going to be practically impossible May - Sept 15 because of the "grandfathered-in" motor outfitters.
67	S	Establish a season for river runners where they can experience true wilderness, Oct 1 - April 30 where there were no motor trips allowed and restricted overflights. Offer incentives to people who choose their trips during this period ie cheaper rates. Spread out launch dates to accommodate the wilderness feel.
36	C	Manage the river corridor for quiet, but not necessarily eliminating motors. Prohibit noise from generators except for emergency needs, not convenience.
36	I	Reduce and work towards the goal of eliminating motors.
36	S	Restrict motor season in the spring and gradually lengthen the motor restricted season until goal of elimination met. As an alternative, have summer the only motor season.
68	S	No more motorized boats on the river.
71	C	I urge you in your Park planning to continue to allow upstream travel to Separation Canyon on personal watercraft.
71	C	A Grand Canyon raft trip is of the highest order of Wilderness experience, but one encounters too many motor boats for this to occur.
69	S	Work to obtain Potential Wilderness and Wild & Scenic designation for the river corridor and tributaries, grandfathering motorized river running.
14	C	Outfitter's use of motors should be monitored for noise and pollution and heavy fines given if they are found in excess of current standards. Hold the outfitters to phasing in new motor technology 30% by 1998 and 100% by 2001. Do not ban motors from the river.
14	C	Outfitters use of motors should be monitored for noise and pollution and heavy fines given if they are found in excess of current standards. Hold the outfitters to phasing in new motor technology 30% by 1998 and 100% by 2001. Do not ban motors from the river.
68	S	Lower the decibel levels of motors.
68	S	Pursue wilderness status as part of the CRMP with input from the public. Grandfather in the use of motors for potential wilderness status for the river corridor.
10	S	I realize it may be difficult, but ban motors. At least offer a non-motor period in the spring.
73	I	The current river experience during most of the year lacks the qualities of wilderness.
73	S	Phase out motor use. Motorized rafts and helicopters are not compatible with backcountry recreation in a roadless setting.

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73	S	Increase private and commercial launch offerings for educational trips, lower income groups, etc. Allow private groups to hire guides. No need to maintain the diversity offered by motor trips, as that experience comes with too high a price on the experience of others, and eliminating motors will not impact the range of people who can experience the Canyon because everyone capable of going down the river is capable of being on an oar trip.
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## *Comments related to Access, Allocation, and Distribution of*

### *ID Statement\* Summary*

4	C	Professional guides provide an educational opportunity and safe river experience. Guides are more protective of the resource. Do not decrease availability of guided trips.
3	I	The current system is discriminatory favoring the wealthy who can go commercial.
3	S	Make allocation for commercial and private the same system. Let permit holders decide if they want to hire an outfitter.
3	I	The current outfitter services lack variety and competition, both motor and oar trips are ultra-deluxe and expensive.
3	S	Create an open market in outfitter services on the river, such as low cost baggage boats for kayak trips.
8	I	CRMP should provide user days for educational purposes.
8	S	User days should be given to accredited universities. Trips need to be more affordable and accessible.
20	I	The current allocation system is heavily weighted toward commercial users.
20	S	Using the current user-day limits, have a first-come, first-serve system where everyone gets a permit then decide whether to do commercial or private trip.
22	S	Create a fund from private fees to buy-out concessions that go up for sale. Transfer user-days to privates.
22	C	Do not reduce the number of user days.
22	C	Do not increase user days w/o EIS assuring zero degradation to the resources or experience.
22	C	The user day system is not fair.
22	S	Count user days below Diamond. Outfitters would reassess the practice of racing for the lake to avoid user day charges. Count exchanges as two user days.
22	S	Keep the current user day system. A launch-based system would promote larger trips.
22	S	Leave the winter allocation the same. Shorten trip length to allow for more trips.
30	C	It would be a tragedy if visitors were limited in numbers by a shift in the allocation between commercial and private parties. Make the river available to as many "non-river rats" as possible.
34	I	Should use of motorized rafts be reduced or eliminated?
34	S	Reduce but do not eliminate the number of permits granted for fast trips. Reissue use for oar trips or 10 to 14 day motor trips. Half trips should be 6 to 7 days.
53	C	The majority of the public wants to travel with a commercial outfitter because they do not have the resources to do their own trip. There is a delicate balance between a profitable and unprofitable company. Reduction in commercial allocation would have an effect on customer service and a company's ability to make a small profit.
53	C	September and May are low use months for commercials. Could the private allocation be increased for these months without reducing commercial allocation?
47	C	Commercial users deserve no more status than private users.
47	S	Reduce the number of commercial launches. Outfitters can shift business to supplying private groups.
58	I	Private paddlers have less opportunity than other members of the public to do GC trips.
58	S	Commercial companies should be reduced gradually over a 10 year period to where commercial demand matches commercial availability and private demand matches private availability. The 10 year wait should apply to every.
65	I	It's unfair that a commercial passenger has immediate access but a private has to wait 8 to 10 years.
65	S	Either eliminate the private waiting list, or have all commercial and private users wait it out together.
65	C	Outfitters have a monopoly on guided services which are expensive and enforced by the government.

\* I = Issue, S = Solution, C = Comment

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65	S	Eliminate government enforced monopoly. Allow people to hire who they want to take them on trips.
65	C	There is a demand for alternatives to private and commercial trips. Some privates would have better trips if they could hire guides.
65	S	Legalize private trips hiring guides.
90	I	Should use of motorized rafts be reduced or eliminated?
90	C	The overall number of river users should remain capped at 22,000.
90	S	Maintain group size for privates at 16. Reduce commercial group size to 25.
11	C	If commercial use is reduced, the private fees would have to increase to make up difference.
11	S	The ultimate trip would be to see no one else. In order to achieve this, the number of people and user days would have to be reduced.
48	C	Further crowding and an increase in user days are unwanted. All types of use should be accounted for including science and NPS trips, and all users charged the basic impact fee.
48	S	Change the number of launches in the high use season from between 4-11 (present) to 6-7 with a 150 person cutoff. Increase spring/fall season to 2-4 launches/day and one winter launch per day. Balance impact of launches each day by use type, trip size and length. Maintain diversity but encourage more oar trips and longer motor trips. Don't decrease commercial user days.
64	I	The current allocation of 70% commercial and 30% private is highly unfair to private boaters and should be redesigned.
64	S	Create an equal wait time for both commercial and private boaters. Reduce trip length for all trips and increase commercial user fees.
64	I	The current allocation system encourages shorter, more profitable trips by allowing "double-dipping" of user days during exchanges. These degrade the visitor experience by limiting time for resource education or the full canyon experience. The current allocation ratio between commercial and private should not be changed.
64	S	Count exchanges as two use days instead of one and set minimum trip lengths of 4 days to Phantom and 3 days between Whitmore and Lake Mead. Do not change the current allocation ratio between commercial and private because guides provide an invaluable role in protecting resources and educating the public.
65	C	Access to the river should be applied equally to commercial and private boaters. Present ratio is questionable at best.
65	S	Make everyone use the same reservation system and be subject to the same waiting list. Do not increase overall use in the canyon with the possible exception of stretching it out over more of the year. Also provide special use permits for educational institutions and persons with disabilities.
64	C	Allow both commercial and private river runners to continue to run the river. More knowledge of river regulations and a way to test it should be required of the private boaters. Have privates get permit on a year to year call in basis.
64	I	The 70/30 allocation is very unfair. Costs of commercial trips are prohibitive for middle class person, and the experience of the canyon should not be only for the well to do. The large numbers of people the commercial trips are allowed is also unfair. Sixteen is a good number, 40 is just too much. Do not increase user days as it is already too
64	S	As more and more people are capable of running their own trip they should have the opportunity. Spread user days out to different times of the year, but don't increase the number of user days as it is already too crowded. Exchange commercial days for private days.
65	C	The ratio of private to commercial is fair and reflects the percent of society that can only see the river by commercial means. Limit the number of private trips you can do in a year to two. Increase the number of user days during off season to spread out use and allow more people in the canyon, thus shortening the wait list. Allow eco-friendly motors for those who can't see the canyon any other way. The fees for private and commercial should be similar since the costs to the park are similar.
65	C	We strongly support Wilderness designation of the Colorado River corridor. NPS should manage for wilderness now and take steps to reduce noise and pollution, and provide access based on what protects the resource.
64	I	The 1979 NPS Plan assured it would allocate river use "equitably between commercial and non-commercial users." No meaningful progress has been made towards equity of allocation. There is blatant discrimination against private boaters which must not be allowed to continue.
64	S	Divide the use 50/50 between commercial and private. Both commercial and private should wait the same amount of time to do their trip. Make three distinct and well defined categories of river users for analysis of use and to help eliminate current discrimination: commercial, administrative and noncommercial.

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35	C	If one person has to wait in line, then every person has to wait in line.
35	C	If the rights of all are to be recognized, then the "free access" of any user must be limited to the extent necessary to accommodate the access rights of others...the question is whether allocation has been fairly made pursuant to appropriate standards.
56	I	The current allocation of float use is unfair and discriminatory. It is in direct conflict with NPS Guiding Principle #10. Those who can afford commercial prices can go every year, while private boater must wait 10 years.
56	S	Grant access to everyone through the same mechanism, then let permit holder decide if they want to hire an outfitter. A Common Pool method would meet guiding principle #10 re: equity to all river users. Retain present waiting list and require everyone to go through the waiting list or use a lottery system.
56	I	The demand for more limited and less-expensive outfitter services is not being met. Currently outfitters enjoy a government approved monopoly on the river.
56	S	Create an open market in outfitter services for the Colorado River. These outfitters should be required to meet basic requirements for safety and financial responsibility.
63	C	The proposal that commercial customers apply for a permit the way private boaters do, makes it impossible for commercial companies to do business in the canyon.
44	C	The park should abandon the historic user-day allocation: it confuses the scheduling of trips, it encourages the outfitter to do short trips which leads to more people in the canyon and at a lesser quality experience. Primary season user-day allocations have been exceeded in both commercial and private sectors.
44	S	Make a logical schedule that incorporates a variety of trip lengths launching each day throughout a common primary and secondary season for ALL USES. Use a computer simulation model to test the schedule and determine if # of contacts remains within the "Limits of Acceptable Change". All users abiding by a sound schedule will alleviate conflicts in the canyon.
44	I	Currently a private trip can show up with 1 to 16 people and have any length trip up to a maximum for that season. There is no way to predict their schedule to avoid crowding.
44	S	The trip length along with a date to pass Phantom must be an integral part of the schedule in order to make the schedule work. Long trips of 18-30 days should continue to be an option, but they must work within a given schedule.
44	I	The current maximum commercial trip size is too large (36 passengers and 6 crew).
44	S	Utilize sociological information to determine the maximum trip size for any trip. Count crew members, they also have an impact. All administrative trips (research, NPS, GTS) should remain within these limits and conform with the schedule.
44	C	The secondary season should continue to offer a trip with significantly less contacts than the primary season. This could happen over the winter season with one launch on a fixed day per week.
89	C	The percentage of user-days between commercial and private should remain as it stands now, with an overall use capped at 22,000 a year. Commercial companies have an investment in maintaining the river corridor and provide NPS with an identifiable group with which to resolve problems with.
11	C	Because of existing development such as Phantom Ranch, current visitor levels and motor use, the river corridor should not be designated as wilderness.
11	S	Remove the river corridor from consideration for wilderness or potential wilderness given development, current use and non-conforming uses (motors).
11	I	Current user day system actively encourages shorter trips, more exchanges and more crowding. A passenger exchange at Phantom or Whitmore should count as two user days, instead of one.
11	S	Count exchanges as two user days as originally defined. Keep the goal of quality of experience and protection of resource; do not offer economic incentives for more broken trips and helicopter exchanges by counting exchanges as one user day. Keep the number of allocated user days to the outfitter the same while considering alternatives to the user day system such as allowing a fixed number of people launches" for each company. No matter what system is used, do not consider guides as a part of the allocation...it would lead to a lower guide to passenger ratio.
11	C	Perhaps private launches could be overbooked based on the cancellation rate from the previous year. The allocation which is being given away in free user days to commercial outfitters who exchange a lot of passengers could be transferred to private allocation. Permittees who have been on the list the longest should have first crack at cancellations when they become available. If data supports it, an across the board cut in commercial allocation may be necessary. Force outfitters to offer reasonably priced commercial
14	C	The private permit system must be structured and operated in the same manner as a business reservation system. It would be unjustifiable to re-allocate use prior to seriously evaluating the inadequacies of the current permit system. Taking user days away from the commercial outfitters for private boaters will not remedy the wait list problem.

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14	I	There is no data to support that standardizing trip lengths and type would reduce congestion on the river.
14	S	Continue to promote a diversity of trip options, lengths, and types for greatest opportunity to avoid crowding. Use the GCNPS computer model for predicting and avoiding crowding for both commercial and private. Do not consider assigned camp sites.
11	I	Wilderness values are being degraded by noise.
15	C	Include the lower gorge below Diamond in the user day allocation. The race of commercials to get below Diamond is stupid and effects quality of visitors experience. Thanks for taking action on the upstream travel of jet skis at Separation.
15	I	There is not clear data on actual use levels on the river due to the levels of use by researchers, NPS administrative use and commercial crew. The total allocation of non commercial and commercial use do not reflect total use.
15	S	Create an administrative use allocation for ongoing monitoring and research trips, NPS trips and other special uses. Develop a total body count system to accurately represent total use and determine carrying capacity.
15	C	Educational use does not easily fit either commercial or noncommercial definition. As access to the resource becomes more competitive, we feel there is general support and approval of use of river trips as a medium for outdoor education.
15	S	Develop a definition for educational river trip use that includes a way to assist NPS in resource management projects. Allow accredited institutions limited access under "Administrative Use" category. Ensure proposed trips meet a high standard in academic curriculum.
18	I	Too many boats are leaving Lees Ferry during the peak months. No minimum length and the user day encourages speed trip and leads to crowding at attraction sites.
18	S	Only 20% of an annual quota should be used in one month. A minimum length of a trip should be set. Eliminate helicopter exchanges. Instead of user days, count as people. Reduce the number of research trips and allow them only off season.
65	I	Congestion and crowding during summer months leads to lack of camps in some areas, not enough room to park boats at some attraction sites, and too many people at them.
65	S	Do not increase private or commercial allocation. Allow commercial companies to launch more trips in the shoulder months and don't force user days into the pool until January 1st. Manage the river on a yearly basis - one season. Don't allow outfitters to use more than 20% of their allocation in any month and don't increase private launches during summer. Don't allow layovers at popular spots ie Nankoweap, Bass, Stone, Tapeats during high use season. Eliminate exchanges at Phantom during high use season to take pressure off camps between Hance and Phantom. Don't allow outfitters to use weekend launch dates left open by other companies. Don't allow motor boats to travel upstream above mile 247 or at least reserve the few camps for slow trips coming down river to mile 247.
15	I	Demand for river time far exceeds the current allocation for both commercial and private boaters. The majority of the public desiring a river experience desire or require professional assistance.
15	C	For most of the public the current system is working well. The current allotment of 70/30 is more than fair for private trips. Do not let outfitters make shorter trips which are not long for people to really see the canyon, create noise (helicopters) and congestion problems for hikers if they walk out. NPS should meet its statutory obligations to protect the Canyon's natural condition while providing the widest access possible to the public.
18	I	The present use allocation is not equitable or fairly offered to all members of the public and conflicts with the 6th and 10th Guiding Principle for the CRMP. Private boaters must wait 10 or more years while commercial passengers can go in less than a year.
18	S	Adopt a reservation based system applicable to all members of the public on an equal first come first serve basis. Phase new system in over next several years. All people including guides should be counted to a maximum party size of 16. Only one reservation per person private or commercial. Require a substantial financial deposit at the time of reservation in proportion to the number of participants. Confirmation of reservation required 60 to 90 days prior to launch or permit will be forfeited and available to others. No shows lose access for two years. Base system on the number of launches per day. Use adaptive management techniques to adjust the system.
20	C	The Colorado River Corridor is a difficult place to experience for the majority of Americans. The variety of trips offered by the outfitters addresses the needs of the greater number of people wanting to do a river trip.
20	S	Do not create problems with a current system that is functioning.
18	I	There is a lack of "educational" river user days. The current permit system makes it very difficult for educational institutions to utilize the canyon as a location for field courses.
18	S	Commercial user days should be transferred to educational institutions. Students could complete service projects for NPS. Commercial outfitters could also provide one or several price reduced trips per season to educational institutions.

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***ID Statement\* Summary***

14	I	The Colorado River should be made available to the widest range of people as possible with equal access provided for both commercial and private river trips.
14	S	Permits should be divided equally among commercial and privates.
90	C	I do not have a problem with helicopter exchanges at Whitmore or motors on the river. Having a no-motor season is good and should be quiet as possible.
90	S	Cap the number of visitors at 22,000. Keep group size maximum of 16 for privates and reduce from 36 to 25 maximum for commercial group.
47	C	Commercial launches certainly have no more deserved status than private boaters.
47	S	Significantly reduce the number of commercial launches. Outfitters can switch their business to supplying private groups with gear and provisions. Make it easier for a private boater to do a trip.
11	C	NPS, while meeting statutory obligations to protect the natural conditions and with existing recreational use caps, should manage the river corridor in such a way as to provide the widest access possible to the broadest reach of the public.
11	I	Beyond the needed constraints imposed by the overall use caps, many other factors unnecessarily limit access to the river corridor. These constraints should be mitigated within the context of the CRMP revision in ways that will not impair or conflict with resource protection objectives.
11	C	The current allocation system is working well and is more than fair to private trips. However, there is no reason to expand the opportunities of commercial companies to make shorter trips, which are not long enough for people to really see the canyon, create noise problems (helicopters) and congestion problems for hikers (if they walk out). If people don't have a week to see the canyon, then they simply don't have time to see the canyon.
23	C	Exchanges allow many more people to experience a river trip by offering shorter, more diverse, more affordable trips.
15	C	Access to the river is discriminatory with research trips having carte-blanche access and commercial trips having a user-day monopoly.
15	C	The same permit process should apply to everyone equally. Exceptions would be trail/beach repair, patrol, extrication, training, and rescue.
15	C	Millions of people worldwide possess the skill and equipment to run the river. Commercial operations should be phased out as they represent nothing more than pure monopolized profiteering in a wilderness setting.
49	I	As the demand for private permits has increased exponentially, the number of commercial outfitters has decreased. The user days allotted to commercial outfitters shifted creating several companies with large numbers of user days. These companies must advertise aggressively, run shorter trips, launch on weekends, creating tense competition between privates and commercials for river access.
49	S	For outfitters with more than 5000 user days, determine what number user days are used as a result of advertising/short trip practices and transfer those days to the private
49	I	Weekend loading of commercial launches, shortened trips, and commercial group size are primary causes of crowding at attraction sites.
49	S	Impose uniform launch system with equal numbers of commercial and private. Group size limits for both is 16 with minimum 7 day motor and 14 day oar trips to Diamond.
49	S	Guide, science, and administrative user days should be included in measuring the real use of the river corridor and the resulting impact. Treat all user days the same. Guides should be counted as user days and science trips defined and regulated.
49	C	Allocation should not be increased for commercial or private boaters. The waiting list problem should be addressed to allow as many different people as possible opportunity to do a private trip.
49	C	National Parks invite visitors. Most people have a positive experience on the river even with perceived crowding. Extend the commercial and private primary season (more than one launch per day) to include the last two weeks of April and September.
20	C	Honor the existing rights of Native Americans and make certain they have the access they need to the Canyon.
20	C	Twenty plus years of advertising has created more demand than the commercial outfitters can fill. Creating even more demand can only hurt the resource and drive prices higher. Commercial outfitters should be banned from more advertising.
20	I	The same type of allocation system should be used by both commercial and private based on demonstrable demand.
20	S	Adjust allocation according to demand using either a lottery or waiting list system.

\* I = Issue, S = Solution, C = Comment

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20	I	Maintain or increase the diversity of commercial trips.
20	S	When demand indicates allocation shift from commercial to non-commercial use, the allocation should come from the larger outfitters. Make the pool of concessionaires more equal to encourage trip diversity for the public. When demand-based allocation shifts from non-commercial to commercial, the increase in allocation should go to the smaller outfitters. Keep the allocation system fair by applying all provisions to both sides equally.
18	C	The present allocation/access system is not fair to all the boating public. This is a publicly owned resource and all members of the public should have equal access and equal waiting time for access. Commercial passengers can go down the river within a year more or less while a private boater has to wait ten years .
18	C	Fairness and non-discrimination towards any person or group of people can only be achieved when every person seeking to float the river places their name in the same common pool of users. This common pool may be in the form of a waiting list, lottery, a combination of waiting list and lottery or some other system that results in equal opportunity for everyone. To preserve the resource, minimize crowding and to strengthen the principles of Wilderness Management within Grand Canyon, the maximum party size will be a total of 16 with no increase in the total allowable use. Maximum trip length and number of launches should continue to vary across the seasons.
30	I	The noncommercial waiting list is too long. The current allocation of user days seems to be unfairly biased against the noncommercial permit holder because commercial trips have much less of a wait.
30	S	If there are any unused user days in a year, change the scheduling practices to eliminate these. Increase the number of private user days and reduce the number of commercial user days. Less favorable solutions would include making the list harder to get on or stay on either through increased costs or increased requirements for being on the list ie proof of river running experience; adopt an annual noncommercial permit lottery; increase private user days and leave commercial user days the same.
33	I	The current allocation system is unfair to private users. The boating public should have equal access to that of commercials.
33	S	Establish a common pool for all users, including commercial. The common pool could be in the form of a waiting list, lottery, or combination. Give equal number of launches to both private and commercial with a maximum party size for both being 16. Consider giving an individual the choice between a lottery or a waiting list, each option providing half of the permits available to the private boater. Allow for alternative trip leaders at least one year in advance of a permit. Reduce the current penalty for a person on the waiting list for participating on another private trip. However, it's not right for a person to go every year. Move administration of permits to a private vendor who would provide 24 hour telephone access with voice mail to check waiting list status, etc and who would accept personal checks and credit cards.
27	I	Access to the Colorado River is not equitable in regards to every member of the public having an equal opportunity for access. The current waiting list means that there is an average wait of ten yeas to get a permit while commercial passengers set the date and pay the money.
27	S	Make access more equitable between user groups. Both commercial and private groups should have to wait an equal amount of time to get on the river.
24	I	The present split allocation system is not equitable and present access system is not fair to the boating public.
24	S	Every member of the public should have an equal opportunity for access to the Colorado River. Every person seeking to float the river should put their name in the same common pool of users and have the same amount of waiting time. If split allocation method continues, adjust annually to meet changing demand. No lottery. Keep annual use at current level. User Days should not be used as a measurement of allocation. The maximum trip size should be 16 including guides. Trip length and number of users should continue to vary across seasons, but accommodate demand for Winter use.
24	C	Develop guidelines to allow the use of paid licensed guides on public recreational river trips.
29	I	The present system for access is not fair to all the boating public.
29	S	Every member of the public should have an equal opportunity for access to this public resource. Every person who wants to float the river should place their name in the same common pool be it a lottery or waiting list.
30	I	There is obviously a demand for non-commercial permits for the Colorado River. There exists a great inequality in access between private and commercial boaters. The non-commercial boater should have more opportunity than currently exists.
30	S	Adjust allocation to 80% non-commercial and 20% commercial. A waiting list of 3-4 years is reasonable.
25	S	Reduce the number of trips per day or stagger trip departures.
32	I	The distribution of limited access opportunities must be equitable to all members of the public. There is a huge discrepancy in hassles and wait time between non-commercial boaters and commercial guests.

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- 32 C A management system must reflect demand, have an objective way to measure demand, and be flexible so that access distribution can adjust. A fair system can't be manipulated by outfitters and users, is simple for the applicant and efficient to manage.
- 33 S Have "common pool" allocation between private and commercial boaters. Penalize private boaters who do not cancel in a reasonable amount of time.
- 33 I The present system favors certain users.
- 33 S Leave the system alone/ status quo, but if any changes, increase fees for private waiting list and make it non-refundable.
- 33 C River access is not fair for private boaters. The current waiting list requires the NPS to redistribute allocation to a measurable system of equal wait time for all users. River use is not a special use! It should not be treated any differently than a hiking permit or a camping permit.
- 33 S The fairest way to assure the opportunity for all of the interested parties to gain access to the river is through a "Common Pool" system which allows for a first come first serve multiple time line entry. This system will start with a 50/50 allocation for private and commercial trips which will be reviewed and adjusted annually to match demand.
- 33 I Crowding on the river. Private launches have not changed use patterns and represent a fairly constant launch flow, but the shift in commercial weekend launches to include Thursdays made a noticeable decrease in crowding impact at major attraction sites. The current discrepancy between trip size limits is such that one full commercial trip equals two private trips...thus one commercial trip affects crowding twice as much as each private.
- 33 S Go to a uniform launch based system with a maximum head count per launch and minimum and maximum trip lengths depending on season. Trip size limit should be 16 for both commercial and private. Minimum trip lengths should be 7 days to Diamond for motor trips and 14 days to Diamond using oar power. Maximum trip length should be the same for all users and kept the same as the current private trip length per seasonal correction. It is important the NPS maintains the quality of wilderness experience for all river
- 33 S Privatize the administration of the waiting list with NPS oversight. Use Common Pool system where everyone calls in to reserve a launch date. A single initial filing fee should cover a user friendly waiting list administration with access to a website for list participants, ability to get on the list anytime, accessibility by phone, and acceptance of personal checks or credit card. A regular public fee review should be performed to keep the fees current and realistic. Launch fees should be based on the total head count for the launch including guides, cooks, swampers, etc. Adequately utilize the off season for launches while preserving the range of wilderness experiences represented in the current management plan.
- 33 I There are private users who would like to include employed individuals such as cooks, musicians, geologists, crew etc.
- 33 S There should be no restriction on allowing the hiring of people to provide services ie cook, licensed guides etc to a private trip. The hired people would get counted in the population of the permit and be at the discretion of the trip leader.
- 42 C The Grand Canyon can't serve the whole world, not everyone can go. Commercial companies can take privates if they get tired of waiting on the wait list.
- 42 S If you need more allocation or private use, allow more launches in fall, winter and spring. Instead of a wait list, use a lottery that is renewed every 3 years. Limit use to one trip every three years. Educate the private boaters on the rights and tolerance of other users.
- 42 C Access to the Colorado River should be available to people who count on outfitters to supply expertise, equipment, and support. This includes helicopters to get us in and out and motorized trips.
- 44 C Because of professional outfitters, many people have been able to have the wonderful experience of the Colorado River trip. There should be a place for those that can run the river on their own, but to come in and take away from the outfitters is a travesty of gratitude and justice.
- 42 C Private river runners in the Grand Canyon represent a relatively small special interest group that is seeking to gain unfair access and control of the river corridor at the expense of access by the general public.
- 42 S Recognize the private river runners as a small special interest group compared to the general public who only have access to the river through the commercial outfitters.
- 33 C There is a huge discrepancy in hassles and wait between the public who wish to guide themselves and those who do not (commercial guests). Rigid quotas for separate groups can become increasingly unfair over time unless they are periodically adjusted to meet demand. There needs to be an objective way to measure demand and a fair system that can't be manipulated by users and outfitters, is simple for the applicant and efficient for managing, and does not undermine financial viability for outfitters nor guarantee they will make a profit.
- 33 S Establish an access policy based on a common pool system. All members of the public need to get a permit to run the river which can be used for commercial or

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- 33 S The fairest way and least headache is to have a common pool which includes guides and researchers. Pull names out of the hopper and let them choose to use a guide service or not. Have groups set reservation dates, say 5 years out. Encourage low season use. Count number of people, not launches.
- 46 C Various trip lengths should be allowed to accommodate groups/families trying to match schedules.
- 46 C The ratio of commercial to private is approximately 6 to 1, but the ratio of people who can experience the canyon commercially to non-commercially must be 60 to 1. Thus, allocation to commercial trips should be increased.
- 41 C The selection process, whatever it is, should be identical for both private and those who wish to use commercial outfitters. This system will automatically match demand. Individuals should be limited to one trip every 5 years or so.
- 37 I The most important problem to private boaters is access. A wait of up to 15 years is not fair to the private boater while commercial boaters seldom have to wait as much as a year. Outfitter allocations are not the major problem. Promoting an open lottery for everyone will simply insure that private boaters lose their already minimum influence.
- 37 S Private boaters "win" only if we increase the allocation for privates without reducing outfitter allocation. Increase winter launches to two per day except during January. In Summer, Spring, and Fall launch a minimum of five parties with an overall maximum of 90 boaters per day. Reserve all presently unused launches for private parties.
- 17 C There is a perception that the river has met or exceeded its capacity to maintain a healthy environment which has negatively impacted the river experience by overcrowding and overuse of camp sites. It is assumed that an increase in user days to alleviate the long wait list would have a negative impact and that an increase in non-commercial use must reduce commercial use in order to not increase total user days. This assumption has created unnecessary conflict. Both user groups serve a worthy purpose and should co-exist in a cooperative spirit.
- 17 S Use computer modeling of put-ins, with commercial trip length, attraction site schedule, interchange locations, and range of camps for specific days to reduce riparian environmental impacts and user contact on the river. This would allow an increase of non-commercial user days to reduce wait list time, while decreasing environmental impact and overcrowding. No commercial user day decrease would be required.
- 45 C Comparisons between commercial and private demand are not meaningful. The greater the change to the current plan the greater the potential for inequity for some groups. Private permit system must support the "values" the public expects/supports for private trips.
- 34 S Establish a lifetime limit for individuals. NPS should determine the extent to which users making two or more trips are impacting the allocations. If recovery of 10% or more of user days could be achieved then formalize a restriction of one or two trips.
- 34 C I am concerned that access to the river for non-skilled people may be more limited by reallocation of guided trips to private parties who have the skills/resources to travel without assistance. Privates serve only themselves, not the general public. Guide assistance actually reduces the impact of river runners on the Canyon, and should be encouraged, not reduced. Rim mass transit and Ranger interpretive assistance to rim visitors would be a great way to allow the greatest access to a Canyon experience with the least impact instead of increasing usage by private river parties.
- 53 C There is a tremendous demand for private trips and the waiting list is very long. Increase private launches during summer season and allow more commercial trips in secondary seasons. Increase maximum group size for private trips to 20. Count commercial boatman in user days.
- 53 C We need more private trip permits, the wait list is too long and commercial trips are being given priority/special treatment unfairly.
- 53 S Count commercial boatmen in allocation. Increase maximum group size for private trips to 20. Allow 2 launches/day during primary season. Increase secondary season user days for commercial trips to make up for the necessary decrease in their primary season.
- 38 I The current allocation of user days is unfair to the large number of private trip permit applicants.
- 38 S Change the allocation ratio to provide equal numbers of available user days issued each year.
- 38 I Crowding at popular camps and attraction sites along the river has become a big problem.
- 38 S Limit the trip size to 16 people including crew for private and commercial trips Count guides and crew as part of user day allocation. Schedule launches to reduce contact between trips.
- 14 C There is too much traffic in the river corridor in the summer month. Major attraction sites and frequently used campsites are deteriorating. The user days ought to be decreased for the sake of the Canyon and future generations who would like to visit it. This many people there at one time is hardly a wilderness experience.

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14	S	Reduce commercial user days by 15-20%. User days could be bought from the outfitter from groups that work to preserve the Canyon as well as NPS. Trim user days from the larger companies with the most user days. The short motor trips have a great impact on the major attraction sites. Count the short trip user days as two for one to help counter the situation or limit the number of short trips per season. Since their user days tax the resource more, they should cost a little more.
72	C	Everyone who sets foot has an impact. Are guides and trainees counted in the commercial numbers?
16	I	The definition of a noncommercial trip is so loose that a growing number of quasi-commercial trips are using the noncommercial allocation. This increases the average trip size, and number of genuine trips which can launch is decreased.
16	S	Develop a clear definition of noncommercial use. Invoke substantial penalties for violation of rules. Forbid motors for noncommercial trips. Forbid noncommercial use when everything is provided by rental service.
16	I	Allocation of use between commercial and noncommercial is inequitable and unfair.
16	S	Make allocation flexible to reflect conditions of demand. Waiting period should be equal for all users. Collect data first year, adapt allocation following year.
14	I	The river should be available to the widest range of people with equal access for both commercial and private users.
14	S	Divide permits equally among commercial and privates.
15	I	The fee structure and permit process for noncommercial users violates the principles of equal access for all taxpayers and visitors.
15	S	Increase private allocation, decrease commercial. Revise noncommercial trip regulations and permit conditions. Revise/simplify NPS functions related to fees and permits.
18	I	There is no recognition of the role educational institutions could play in GCNP river management.
18	S	Require outfitters to provide for at least one low-cost trip for educational institutions. Educational trips for service or research projects could come from administrative
18	S	Distribute use through a high use season in conjunction with a minimum trip length of 14 days.
18	C	Urge the NPS to consider needs of the average person and physically-challenged when allocating use. These people are best served by outfitters.
18	I	The current system makes it difficult for educational institutions to use the canyon as a classroom.
18	S	Transfer commercial user days to educational institutions. Outfitters should offer one or more price-reduced trips affordable to institutions.
18	I	Peak-season overcrowding at major attraction sites along the river corridor with negative impact on wilderness experience.
18	S	Reduce number of users. Commercial use could be reduced or spread-out over longer season.
19	C	The waiting time should be redistributed to a measurable system of equal time for all users so the allocation is not arbitrary.
19	S	Use common pool system to assure fair distribution of use.
19	S	Base allocation on demand. Develop formula to determine demand based on waiting list participants, average trip length and average number of people on private trips.
19	C	Without changes to use patterns in private launches, there was a notable decrease in crowding at attraction sites following shift in commercial weekend launches.
19	S	Use a uniform launch-based system that includes maximum size, and minimum and maximum trip lengths which vary by season.
19	S	Incorporate "queuing theory" computer modeling into launch system that monitors use at attraction sites.
19	I	There is a need to address the demand for and allocation of winter use.
19	S	Redistribute use across seasons, increasing commercial use in winter: 4 launches/day in April to Oct 15, 2 launches/day Oct 15 to Nov 15 and Jan 15 to March, 1 launch/day Nov 16 to Jan 15. This will preserve the wilderness experience.
19	C	While the current system favors the outfitter customers, the importance of the outfitters cannot be overlooked. However, a balance needs to be found between outfitter and private use.

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20	C	The NPS needs to assure public access to professional assistance to allow for safe and enjoyable trips. The variety of trips offered by outfitter meets the needs of the greatest number of people. The NPS should not create problems with a system that is functioning.
72	C	A new system for managing private permit applications should be instated and given a trial period before any user days are taken from the commercial outfitters.
72	C	The system will be in balance when the commercial user has to wait as long as the private user.
64	S	Protect canyon by reducing total use and change user days to 50/50 split between private and commercial.
70	C	Support access for persons with disabilities, and encourage outfitters to accommodate the underserved. Increase cultural diversity of users including ethnic and low-income.
70	C	Keep commercial allocation at present level.
70	C	No user day charge for disabled attendant.
38	I	There is a lack of relevant data on use patterns at attraction sites upon which to base decisions.
65	S	Reduce total number of commercial user days and science by 25,000 (at 5,000 per year). Increase trip lengths especially for motor trips.
10	I	Lack of timely access to the river is a result of insufficient allocation for the private sector. The current system is 20 years old and does not reflect a change in demand for preferred type of trip.
66	S	Space launches so that the same number of trips and people launch every day.
39	C	It would be ideal to have a common pool. Privates and commercial users should have equal access.
66	I	Access is not fairly distributed or available to all. Wait time should be same for commercial and private users.
66	I	An unfair burden of time spent waiting for a trip is unfair for private users while commercial users a year or two.
66	S	Establish a freedom of choice pool for 1) all users, and 2) for trip leaders, and determine passenger list one year prior to launch.
66	S	Institute launch management instead of user days. Limit trip size for all to 16. .
66	S	Count commercial guides in user days.
60	I	The current access and allocation systems for commercial and private recreational use are flawed and inequitable.
67	C	Any person wishing to run private or commercial should have the same waiting time and be charged the same fees.
67	C	Continue to promote access for persons of all abilities. Require outfitters to submit an annual report on number of persons with disabilities served, and accommodations made by the outfitters.
67	C	Maintain the current allocation level for commercial use.
67	S	Start a special needs allocation to benefit people with disabilities or chronic health issues and expand cultural diversity. Provide river trip access at a more affordable cost.
67	C	Continue to not charge user days for attendants in keeping with intent of ADA.
67	C	Seek to increase the cultural diversity of river users. Being a good steward is not directly related to having money or knowing how to run a rapid. It is acquired when people experience GC first-hand.
67	I	Unfair allocation of river use. The inequity stems from the fact that public demand for a GC trip varies constantly, but the use allocation between private boaters and commercial clients has remained the same.
67	S	To determine demand, let a free market decide rather than an arbitrary split .
66	I	Inequity between private and commercial waiting time
66	C	Support longer minimum trip lengths especially for motor trips. Do not double dip on user days. Reduce commercial group size.

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66	S	Outfitters should be required to offer low-cost trips for education, economically or physically challenged.
58	S	Buy back commercial days gradually and roll over into private pool
58	S	Allow kayakers to buy days from commercials that decline kayakers on trips.
58	S	Reduce allocation over ten year user days to match demand for trips
66	S	Reduce the number of outfitter user days and increase the number of private launches.
67	C	Current management system arbitrarily and unnecessarily creates classes of river runners. Forces river runners to classify as commercial or private.
67	S	Create common pool or freedom of choice system with a lottery for repeat users.
67	I	Current system uses an arbitrary allocation and does not respond to actual demand.
67	S	Develop allocation system that reflects and adjusts to demand between commercial and non commercial
67	I	Current system excludes large segments of the US population based on access and cost of trips.
67	S	Remove the price of access from commercial trips by creating a common pool system. Increase competition by increasing number of outfitters. NPS should license outfitters who provide low-cost trips.
67	I	Outfitters are re-selling access rights.
67	S	Adopt a system that does not rely on access rights to outfitters.
67	I	Inequitable launch dates options commercial vs. private
67	S	All users should reserve launch dates including those well in advance.
67	I	Current clustering of launches on weekends increases crowding and encounters.
67	S	Evenly distribute all launches over the week. Reduce maximum group size.
67	S	Count guides in the commercial user day count, do not add more user days for them.
66	I	Unequal access to permits and waiting time between commercial and non commercial
66	S	Space out launches, equal number of launches per day.
66	I	There is an inequitable number of user days for commercial and private.
66	S	Decreases commercial, increase private user days.
66	C	There should be a single waiting list for all boaters.
39	S	There should be a common pool system.
64	S	50/50 split for commercial / private allocation of permits
64	S	Set up launch requirements and sort by trip size and length.
66	S	Institute a Freedom of Choice system.
67	I	Unfair allocation of permits
67	S	Institute Freedom of Choice allocation
44	C	The problems in the system should be dealt with using the current total allocation of use.
44	S	Do not increase use levels. It would increase visitor contacts, congestion at attractions and camps. Examine carrying capacity through research.

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44	C	It is possible to achieve a reasonable waiting time without changing the current allocation.
44	S	Create committee to research issue of waiting list, maintain current allocation level.
44	I	High trip costs, minimal opportunities for under-served public.
44	S	Outfitter should offer low cost trips for low income. User days to educational trips. Transfer company sale days to special low cost allotment.
44	I	Range of trips, costs, and opportunities are diluted by the sale of companies.
44	S	Reallocate days from sold companies for lower cost and educational trips. Special incentives for smaller companies. Cap size of companies, no shorter or faster trips.
44	I	The current allocation/user-day system compromises the visitor experience by encouraging shorter, faster trips with multiple exchanges to maximize profit.
44	S	Move to a system based on number of people rather than user days. For each outfitter, the total current user days would be divided by average trip length -- this would be their total number of people or allocation.
44	S	Specify a min. trip length of 4 days to Phantom, 7 days to Whitmore and 8 days to Diamond or the Lake. Will add flexibility, result in less crowding. Allow only one exchange per trip, either at Phantom or Whitmore.
44	S	Move to a launch-based system where a given number of launches are allowed per day. Reduce group size to 25 for commercial trips (16 on private). Suggest two commercial and two private launches per day in primary season.
58	I	Kayakers have less opportunities to purchase space on a commercial trip.
58	S	Kayakers should be able to purchase user days from outfitters that decline to take them when requested.
65	C	The carrying capacity has been exceeded. The resource is surviving but the visitor experience is suffering, especially at attraction sites.
10	S	Expand winter, spring and fall use seasons. End seasonal preferential use by commercial in summer. Increase private launches.
66	I	The current allocation unfairly favors commercial users over privates.
66	S	Change the allocation user days based on demand for commercial and private trips. Adjust allocation annually.
39	C	Outfitters drive demand by advertising. Private demand is driven by interest. NPS should have controls on advertising.
66	S	Require everyone to be on a single waiting list. When your turn comes up, you have choice between commercial or private launch.
66	C	Stop turning GC into a business for a few outfitters. Reduce commercial use.
10	C	The number one priority should be to make the Canyon accessible to the as many people as possible; there must be a diversity of trip types and lengths. Maintain the current levels of commercial use. Allocation based on user days is a fairer way to deal with canyon usage. Exchanges are needed. Helicopters are needed for diversity and are not intrusive.
10	C	It's not necessary to assign camps or attraction site times at this point, but larger campsites should be reserved for larger groups.
10	C	Schedule science groups in the off season to free up permits for private boaters.
39	I	The wait list is extraordinarily long and unfair for private permit hopefuls. No transferability of permit after long-term, high emotional and financial investment. Loss of placement on list after 2 other trips taken during this long wait.
39	S	Gradually move to a system where commercial and private make a reservation through an office (either NPS or contractor) for a future date and a limited party number. Failing that, allocation should be increased a substantial amount to the privates and reduced to the commercial. Include commercial staff in user day count. Abolish 2 trip limit for those on wait list and make permits transferable to any person in the party, who then would be removed from the wait list if already on.
39	I	Privates are strictly prohibited from hiring any person to perform a service for their trip. In contrast, commercial customers hire someone to do everything for them.
39	S	Allow privates to hire someone to perform services (cooks, guides, boatmen).

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39	I	Crowding at attraction sites promises to get worse with time and if total allocation is increased.
39	S	Set a formula to define crowding which should be different for each site and based on environmental impact, not peoples perceptions. Use computer modeling to limit the number ie rescheduling launches etc.
47	S	Limit people on private and commercial trips. Use a lottery for private trips and cap with lottery on commercial trips. Limit or end overflights and prohibit motors.
41	C	The concession for sale should be offered to the public so that all could have an opportunity to bid on it, or , the number of user days should be returned to the public in the form of an increase in individual river permits.
41	I	There is an inequitable distribution in river running access for private individuals.
41	S	The annual number of commercial customers should be reduced by the number of private permittees on the waiting list. What is left over can be transferred to private companies for a fair concession fee. Paying customers should also be placed on a wait list similar to the private list.
47	I	There should be a more equitable balance to the use of the Colorado River by commercial and private boating trips.
47	S	Make the wait for commercial and private trips more equal. Quit showing favoritism to commercial river use.
45	C	Do not increase allocation before seriously examining the system. It is probable that some trips can be combined to shorten the list. Ask those on the wait list if they would like to get on the river sooner by consolidating permits. If fees aren't reduced, spend money fixing the broken system.
45	C	The high costs of a river trip in Grand Canyon is too cost prohibitive for the majority of Americans. Our parks should be accessible to middle and lower income individuals.
45	S	Keep allocation status quo to be consistent with 1995 GMP to protect natural quiet and solitude. NPS could buy user days from commercial companies when they are offered for sale and make these user days available for educational trips, scholarships for less privileged people, or low cost outfitter trips.
45	I	If visitation is increased, overcrowding at popular sites will be more disturbing to everyone.
45	S	Do not increase total allocation of user days. Eliminate exchanges at Phantom and Whitmore. Encourage longer trips. Educate users about alternative sites to visit and encourage communication on the river as to plans. Keep flexibility on the river.
45	I	Access by a diversity of people with opportunity for a variety of experience.
45	S	Retain commercial allocations and at least 12 companies in order to foster a diversity of experience offered for a variety of values and needs including different propulsion type, trip length, exchange points etc. Retain contractual incentives/requirements for outfitters to provide opportunity for persons with disabilities.
45	S	Retain motors. They provide flexibility to avoid trip build ups and reduce group contact. Lengthen trips by 1/2 day to give more flexibility. Limit outfitters to using no more than 25% of their allocation in any given month. Use computer modeling to design Lees Ferry departures to avoid conflicts.
45	C	Private trips are sometimes too small, which increases incidence of group contact and may compromise safety. Maintain commercial group size of 36.
45	C	No motor season (9/15 - 12/15) coupled with secondary allocation period starting 10/1 should remain unchanged. An increasing number of customers have discovered this time period and are choosing these times for a higher quality experience.
54	C	My experience on the river leads me to the strong conclusion that environmental and safety concerns, together with an effort to maximize undamaging exposure of a reasonable number of citizens to this experience, dictate no change in the ratio of private to commercial permits. Proof of private parties' experience and knowledge of the environmental regulations in the Canyon should be required. Motorized trips are critical to the vast majority of people being able to "run the Canyon".
11	C	The overwhelming majority of the public who desire a river experience also desire or require professional assistance. For this majority, the current system is working well. The current allotment of 70/30 is more than fair for private trips. However, there is no reason to expand the opportunity for commercial companies to make shorter trips which are not long enough for people to really see the Canyon, create noise problems (helicopters) and congestion if people hike out.
11	C	There is currently inequitable and unfair distribution of user days between commercial and private users. It is unfair to require privates to wait ten years while commercial passengers can go in the current year. Commercial statistics are unfairly skewed by allocation of prime summer dates and failure to count guides, cooks etc as user days.
11	S	The time it takes to do a trip should not be different for privates and commercials. If this means reducing commercial trips then so be it. The current demand should be determined and used as a basis for allocation. Preferences accorded to commercial operators should be eliminated or factored into the determination (ie commercials are given the prime summer time slots). Count users the same for all trips and include guides and cooks.

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48	C	Private boaters have created their own problems concerning the waiting list. They have a 40% drop out rate. These "once in a lifetime" boaters, once they've seen it, couldn't care less how they leave it. The outfitters are in with the NPS for the long haul and leave the canyon each trip the way it was. Leave the system as it is now and give outfitters the user days the privates don't use.
15	I	Private boaters must wait 10-12 years for a permit while commercial customers can do a same week trip. A more equitable system should be devised so that commercial customers also have to wait.
15	S	Allocate a bigger proportion of permits to private boaters. Devise a lottery system for commercial passengers with fees, application, and a permit to be filled by a commercial outfitter.
19	C	A permit user group should be designated for educational institutions. Selected educational institutions like Presto College could provide valuable services to the Park through proper service/research projects. Commercial groups could provide discounted trips for educational groups.
88	C	The current allocation system is grossly unfair to private boaters. I propose adding no more days to the allocation, but change the distribution to 50/50 and include guides, cooks etc on commercial trips as user days. Limit commercial trips to 16 including staff.
14	I	Permit system is skewed too much in favor of commercial outfitters over private boaters.
14	S	Give the privates more permits in the spring and fall, even up the ratio between privates and commercials by reducing commercial user days overall. Resist double launches for privates. Keep the wait list and resist the lottery.
14	I	The trend toward fewer and bigger companies is alarming. Diversity and personality of a variety of companies is being lost to the mega companies as they purchase the user days of the small companies.
14	S	Set a limit on amount of user days or launch dates for outfitters. Maintain a constant number of permittees; don't let the number drop below what it is now. Buy the next company for sale and retire the user days/launch dates to reduce crowding on river. Require the buyer of the next company for sale to do low cost educational trips or allot the user days to educational or special population groups.
18	C	Gather and release pertinent data and facts related to the current system. An increase in allocation for private boaters is not appropriate if it is shown that private boaters constitute less than 32% of those wanting to do a river trip. Do not allow any new river companies.
26	C	During the process of developing the CRMP, take profit out of the equation while considering first and foremost what is best for the Colorado River. Establish those criteria and then negotiate who gets to be on the river, for how long, motors or no motors. The Canyon with the sound of plane and motor boat traffic is still beautiful, but it has lost some of its wildness.
66	C	The CRMP should protect the values of beauty, remoteness, wildlife, and ruggedness, and place necessary limits on users so that the river ecosystem is not damaged.
66	C	Most people who desire to boat the Colorado, do not have the knowledge, skills, or equipment to do it without a guide. This opportunity would disappear for many if allocation were decreased for commercial trips.
66	S	Maintain existing allocation for commercial trips. It would not be a good idea to place commercial passengers on the same waiting list as private boaters. To shorten the wait list, perhaps private boaters should only be allowed one trip or a limited number of trips until everyone on the list has been accommodated.
59	C	Keep the same or increase commercial allocation. Reduce the punitive fees which are a regressive "tax" on users of commercial services which are self-regulating and of minimal cost to the agency and resource.
33	C	River access is not fair for private boaters. NPS should redistribute allocation to a measurable system of equal wait time burden on all users so that allocation is not arbitrary. River use is not a special use! It should not be treated any differently than a hiking or camping permit.
33	S	The fairest access for all is through the Common Pool system. Count every human as part of the allocation. Applicants declare at the time of reservation whether their trip is a private or commercial. All reservations from a waiting list will be issued a minimum of 18 months prior to launch. This system will start with a 50/50 allocation between private and commercial with adjustments made according to demand.
7	C	Commercial passengers simply call an outfitter and can schedule a trip anytime as many times as they can afford. Private boaters must follow a lengthy, costly, and complicated process with a wait list of approx. 8 years before they are allowed to go. Not including the guides, cooks etc in the user day count in reality increases the
7	S	Establish a Common Pool system to create a "level playing field" for all those desiring a river trip. Current system fosters a huge, expensive bureaucratic nightmare of requirements, deadlines, complicated fee schedules that discourage private trips and fosters a commercial monopoly.

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6	I	70% of trips are allocated to commercial river runners.
6	S	The allocation should be at least 50/50 commercial/private.
6	C	At present, it appears the NPS subsidizes commercial enterprise at the expense of other park users. Concessionaires are allowed the chance to make a reasonable profit, but it is not a purpose of the NPS to ensure that concessionaires make a profit.
17	C	We were pleasantly surprised at the minimal number of other river travelers we encountered on our August trip. Therefore, we encourage NPS to keep the current 22,000 river trip passengers per year. The general public needs the expertise of professional outfitters for safe and complete enjoyment of the Canyon experience...this is paramount in the planning process.
18	C	To enhance the "wilderness experience" disallow passenger exchanges for commercial trips. If people want a shorter trip, there is the motor option. For private trips, keep the same allocation but shorten the maximum days to 14 for fewer contacts on and off river.
5	S	Move towards 7 day motor and 13 day oar powered commercial trips with equal number of passengers launched on each day of the week. Shorten private trips to 13-16 days.
5	I	The current management plan hasn't acknowledged the huge growth in private boaters able to raft rivers like the Colorado. The current allocation is out of sync with the reality of access demand.
5	S	Determine the true demand for commercial and private access and adjust the user days accordingly. User days should be transferred to the private users until the demand is equalized.
12	C	I do not believe that the allocation to private individuals should be increased at the expense of commercial outfitters. The present 70/30 percent allocation is about right and should not be changed. Many people like myself lack the experience, money, equipment and physical capabilities to experience a wilderness area like this "on their own".
18	I	The current permit system encourages overcrowding on the river. There are too many humans on the river in summer and group sizes are too large, making it difficult to enjoy the peace and solitude of the canyon. It is often impossible to find a campsite because all are taken.
18	C	Eliminate all commercial trips, rafting companies have had their time of easy money. Ban all motors and decrease maximum group size to 13.
29	C	The current ratio of 70/30 is appropriate and should be maintained. NPS must continue to limit the number of river trip passengers allowed to pass through the canyon each
52	I	Private river runners don't have the ability to hire a guide which may be the most important person/item on the list. A person hired to guide the private trip may save the trip or lead it to a higher level of safety and enjoyment.
52	S	Allow the hiring of guides that meet the qualifications for "Qualifying Boatman" for GCNP private trip requirements.
52	S	The secondary season use is too low and extra user days may be added to these seasons. Allow commercial outfitters to shift primary season user days to secondary season. Allow privates to use some of the "freed-up" primary season user days and increase the private secondary season use. Some adjustment in burning of firewood might be needed. If outfitter goes out of business, give those user days to privates.
19	C	Equal access to public lands of National Park system needs to be guaranteed. Monetary status and monetary considerations cannot dictate who can take a river trip and who must wait. Have a 50/50 split on total number of user days, launches and number of people. Reduce commercial group size to 16, reduce number of launches to one per day (commercial) with one day a week given two launches, and require longer trip lengths with lower group size, and count guides and swampers as user days. Don't count private trip leaders and boatman in private user day totals.
20	C	Today we are operating under the 1977 allocation of 70/30 split between commercial and non-commercial. No adjustments have been made to reflect changing demand. Privates must wait up to 10 years while commercial users can gain access in a given year. Guides are not counted as user days, outfitters often exchange clients once or twice in the trip, and private boaters tend to take longer trips resulting in a much lower number of bodies that float the canyon/year are counted.
20	S	Use ceilings are a necessary management tool to preserve the river resource. A management system must reflect demand, and be flexible so access opportunities can adjust, can not be manipulated by users/outfitters, is simple for the applicant and efficient for management, does not undermine nor guarantee profit for outfitters. Experiment with the Common Pool system and privatize the wait list to reduce overhead and prevent abuse.
10	I	Equality of river access is an extreme problem. The present allocation is obviously unfair and biased against the private boater.

\* I = Issue, S = Solution, C = Comment

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- 10 S Use the number of people launched as the allocation measure, not user days which is biased toward fast motor trips. Use the same measure for launch scheduling for both commercial and private. Make the primary and secondary season the same for commercial and private. If possible, increase the number of persons allowed in shoulder/winter periods.
- 18 I The current allocation system is not fair to all people who wish to use the resource. Everyone should have fair and equal access.
- 18 S Create a Common Pool system for all users that gives the same amount of waiting to each user. The permit holder can decide to go private or commercial.
- 18 C There should be a maximum party size of 16. This should include guides and clients.
- 18 C A certain number of permits should be allocated to educational institutions. People's awareness of the Canyon and its natural history would benefit greatly by such educational excursions.
- 25 C The thought of turning the river over to private tours with non-professional river runners at the expense of outfitters that meticulously follow NPS rules and requirements is appalling. Waste management, destruction of camping areas and other problems will occur that would not with professional river outfitters. Keep present policies.
- 23 C NPS has inadvertently created a virtual monopoly in favor of those guide services owning a portion of the strictly limited user days. In effect, a few for profit businesses have obtained ownership of a part of the Grand Canyon for their own use and profit. This is in conflict with the basic mission of the NPS. All people who wish to float the Colorado should be treated the same without regard to whether they wish to hire a guide, with the same rules re: obtaining a permit and same requirements to protect the Canyon.
- 23 S Every person or group wishing to float the Colorado may apply for a permit to do so. They may then hire a guide from a list of guide services approved by NPS. All are required to follow same rules regarding safety and protection of the Canyon.
- 10 C I prefer to see little changed in the current plan and no change in the allocation of numbers between outfitters and privates. I would not like to see more than the current 22,000 passengers allowed to use the river corridor. Outfitters minimally impact the area and serve as educators & preservationists. Also, they are well trained and safe.
- 13 S There is an obvious imbalance between commercial and private allocation. Make it a 40/60 ratio with the extra private use coming from the largest commercial outfits. Allocate days for special populations, youth at risk, etc. Spread commercial use out throughout the year, and outfitters cannot use more than 20% of their allocation in any given month.
- 18 S Create a river user group especially for educational institutions. Commercial outfitters could provide one or two low budget educational trips a year to the institution of their choice. The Park could benefit by using their skills in a way that could give something back ie a research project.
- 28 I The present access system is not fair to all boating public and the split allocation is not equitable.
- 28 S Every member of the public should have an equal access to this public resource. Use a common pool system. If one person must wait, everyone should wait their turn. Give private boaters the same number of launches with same number of participants as outfitters. Make maximum party size 16. Make provisions for an alternate trip leader on private trips. Do not remove person from wait list for participating in other trips. Give permit system to a private vendor.
- 37 I The current user day system rewards the fastest possible trips, with the most possible exchanges. This hurts the once in a lifetime commercial passenger and everybody else because boatmen have no flexibility to adjust for other trips or unforeseen circumstances.
- 37 S Lengthen minimum trip duration: motor trips should be at least 7 days to Whitmore, 8 days to Diamond, 4 days to Phantom. Switch to people instead of user days and divide total commercial days by total commercial trips run per year to arrive at a mean. Take that mean number and divide each company's user days by it to arrive at the number of people each company can carry per year.
- 37 C Switching to launches is a solution but would not work so well because it would homogenize use over the entire year and would lose the wilderness qualities currently available in the shoulder season.
- 37 C The overall system should reward whole trips as opposed to split trips. Count exchange days and don't give outfitters a free user day every time they split a trip.
- 51 C It is very important that both commercial and private groups have continued access to the Colorado River. There is a place for motor trips...they allow a shorter duration trip. I have not been distracted by motor noise from planes or the raft. I would hate to see further limitations on commercial trips since most people do not have the equipment, skill, or time to devote to arranging their own private trip.
- 1 C The numbers who want to see the Canyon "up close and personal" are staggering. The thought of bigger and more frequent boats is just not appealing.
- 19 C A greater percentage of user days should be allocated to the non-commercial river running public. The wait list is a fair means of allocating trips. Weeding out the non-serious folks with higher fees and continued interest rules is fine. User days should not be increased, there are enough people down there already and the well being of the river comes first.

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- 15 C Schedule some of the large 6-8 day motor trips in early summer with fewer of the 13-14 day trips during this time. Schedule them in late summer or September and stagger dory and longer raft trips for 23-24 days at a time to give them the benefit of the wilderness experience. This should allow more spread in the use of campsites.
- 20 C I would never have been able to do a private trip of 10-15 days or longer, nor could the majority of the 250-300 other passengers I've gone down the river with. The 6-7 day trip fits very well into schedules.
- 14 C Count everyone, including guides and assistants, and then give the privates 30% of that number. There will be more user days for privates. Push some private launches to shoulder seasons. Make sure ratio of guides to passengers stays the same as present. There is a maximum number of people on the river each year now, do not increase user days. Buy and retire user days as companies go out of business.
- 2 C Present allocation is unfair. Folks with money and willing to be a passenger wait no more than one year for a trip. Private parties wait for up to 10 years.
- 2 S Change the allocation amounts so there is not such gross favoritism granted to commercial permits. Do not increase the number of overall river travelers. Take a portion of the private wait list (30%) and make it a lottery.
- 2 S Consider assigning camps to commercial users during the peak season months and make that information available to the privates. Rotate popular camps so the commercials don't always have a lock on them. Spend some of the new fees on improving camps down below Separation. Make these camps for non-motorized crafts only.
- 69 C I encourage NPS to promote access to the Colorado River for persons of all abilities including those with special needs. Maintain the current allocation level for commercial river companies and investigate incentives to encourage companies to address under served groups. Do not charge user days for needed attendants for disabled persons.
- 68 C The NPS should set commercial trip sizes and total numbers of rafters FIRST and then pursue maintenance of beach size, number and location to sustain the numbers especially if such an action places unreasonable demand on other resources.
- 68 S Fit user days to the availability of beaches rather than fitting beaches to a fixed user demand as is now done. Each year the capacity of beaches to accommodate users could be inventoried and this capacity would then guide the permit numbers for the year.
- 68 C I was injured in a skiing accident which resulted in brain stem and spine damage. Participating on the River of Dreams trip was a fantastic success. Do all you can for the continuation of the River of Dreams program.
- 68 C I was privileged to be a member of a River of Dreams trip. It provided a challenge which made me happy to accomplish. Continue to provide and improve this service. Please consider the population of people with disabilities.
- 70 C The most important issues are preservation of the Canyon, equal and fair access for all users, and enhancement of the Wilderness experience. The Canyon is a public resource which should be managed for the benefit of all the public, not just the outfitters.
- 70 C We recommend a permit lottery system for both private and commercial river users. The permit holder can decide to do a private trip, hire a guide or hire a commercial outfitter. Decrease the group size to ten and decrease the number of user days on the river by 5% per year over the next five years to increase the wilderness quality. Limit the number of trips per person (excluding guides) to one per year and a maximum of four trips in 10 years.
- 65 C Some people want to be able to hire guides or cooks for private trips. Fostering a new market for new types of "charter trips" would add to the present unresolved problem of accommodating traditional commercial and private trips. Open the issue of charter trips after the reservation system is operating smoothly.
- 65 C The NPS river office should view commercial outfitter reservations on a regular basis through the internet, a private web site or similar type of system to see what space is booked and what is vacant. This will more accurately measure demand for allocation adjustments.
- 65 C Since 1979 NPS has not taken significant steps to measure demand or to adjust the allocation, so at present the system is unlawful. The law requires sufficient transfers of space from commercial to noncommercial when a change in demand is evident. Whatever the allocation ratio, the waiting time to go on the river should be equal.
- 65 S NPS should draft "appropriate standards" for managing allocation and finalize them in consultation with Congressional staff. The standards should not make any actual transfers; they should say what transfers will be made in the future if certain criteria are met. A fair and lawful system can be achieved with a series of case by case transfers, in response to current demand, without changing the initial concessioner allocations, or with regular changes in the initial allocations in response to current demand, or with a
- 68 C I urge NPS to maintain the right of access to the Colorado River by people with disabilities. Allow for special needs charter trips and inclusive commercial trips. Realize that a person with a disability might need to bring an attendant on the river trip with some form of allowances.
- 67 C Continue to promote access to the Grand Canyon river corridor for persons of all abilities. Full inclusion for persons with disabilities has not yet been reached. Require outfitters to submit an annual report on the numbers of persons with disabilities served, their types of disabilities and accommodations made by the companies.

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- 47 I There is a lack of commercial use in the late shoulder season. User day accounting based on a "use it or lose it" system means that cancellation or unfilled space is September results in irretrievable income loss for outfitters.
- 47 C Some incentive to allow outfitters to schedule September trips is necessary.
- 68 C Continue to support the accessibility required by our citizens with special needs. The majority of the public who desire a river experience also require professional assistance to complete a safe, enjoyable, educational trip. For those with special needs this is expanded to include personal attendants and professional medical personal to ensure their
- 68 C Trips should be available to the disabled and consideration should be made for those needing a personal care attendant. Such a helper should not be charged a user day fee to the outfitter.
- 70 C My trip with the River of Dreams was revealing in many ways: it was inspiring to see other handicapped passengers cope very well. And what a joy to see a team of volunteers, people from all walks of life, work together. Access for people who can handle the slight inconveniences should certainly be allowed and encouraged.
- 68 C Continue to promote access to the Grand Canyon corridor for all people with disabilities. Have the outfitters be more accountable in complying with ADA. Safety should not be an issue that limits access for people with disabilities. Develop a permit system that allocates for special needs at specific times for health reasons and keep costs down because people with disabilities generally cannot afford commercial rates. Do not charge user days for needed attendants.
- 68 C Maintain the current allocation level for commercial river companies. Most people do not have the equipment or experience to do their own trip. Cut back on some of the motor rigs or have companies buy much quieter motors.
- 69 I The current allocation system is heavily weighted towards the commercial operators and does not consider the number of private boaters that has mushroomed in the past two decades.
- 69 S Do not increase user days, but balance the numbers towards private boaters after an accurate assessment is made of this situation. The large number on the waiting list indicates a powerful need for change.
- 67 S Do not allow outfitters to double dip their user days at Phantom and Whitmore exchanges. Channel these user days into the private user day pool. Offer incentives to privates who do trips in the off season, who do smaller trips and who do longer trips. Let private users know where the new fees are going via a detailed quarterly mailing.
- 70 I The current allocation split forces the public to either buy short wait access from a commercial outfitter or wait up to 10 years for a "natural" turn to go down the river.
- 70 S An individual or small group permitting process should be encountered by all. The permit holder will decide to go private or hire an outfitter or guide. Have a standard allotment of 20,000 travelers a year. Keep group sizes at maximum 16 on private trips and 32 including guides on commercial trips.
- 70 I The current wait list program excludes wherever possible, qualified and interested navigators from standing on the list. This is done primarily to shorten the list wherever
- 70 S Develop an equal access/freedom of choice mechanism for all river users. Use private enterprise to manage the system, computer networks, phone and fax information programs. Should wait list become greater than 2 years, prohibit advertising. No specific allocation would be given to any outfitter.
- 36 C Privates want an increase in use. Commercial sector could easily justify asking for an increase in use but have chosen not to. Commercial demand is higher now than ever, and is increasing rapidly. The method used by privates to show demand is flawed.
- 36 S It is important that people are pre-qualified before getting their names on the wait list to keep those who do not have the experience or expertise from crowding out the people for which the private trip system was designed. Investigate the 3-track system presented at the September workshops. Increase private allocation in the secondary season. Change the dates of the secondary season for privates to match commercial sector secondary season.
- 70 C The River of Dreams rafting trip changed my life. Please continue to allow the Grand Canyon and Colorado River to be accessible to people with disabilities to have primitive recreational activities consistent with wilderness experiences.
- 68 C The paramount concern of the CRMP should be preservation of the resource. In light of the deteriorating conditions along the river corridor relating to human use, there should not be any increase in total allocation. Monitor conditions along the corridor and reduce total use-days if necessary to protect the Canyon resource.
- 68 C Given that the NPS has, of necessity, limited the total allocation of user days, a de facto monopoly has been created with respect to the commercial sector. Such monopolies must be regulated in the public interest.
- 68 S Adjust commercial allocation so that each outfitter can hold no more than some minimal number of user days, regardless of acquisitions of other company's physical assets. Make provisions for other bona-fide start up companies to acquire minimum user day allocation. Place remainder of commercial user days in a pool to be released to outfitters through user preference. Monitor pricing and set a maximum rate of return on investment.

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68	C	Crowding should be addressed through better managing not just of the number of launches per day, but the number of people in the party and the trip length. Encourage longer trips and discourage passenger exchanges to provide more flexibility in schedules and enhance overall visitor experience. If this isn't effective, then reduce total number of user days.
28	C	The Colorado River has reached its carrying capacity for river runners. No increase in the total allocation for river use must be allowed.
28	C	Most of the congestion at attraction sites and competition for camps occur in the peak months of June, July, and August. To help spread out commercial use over the summer season, extend motor use to Oct. 1. Require that no outfitter use more than 22% of their allocation in any given month. Have outfitters standardize their main schedule of trips after computer modeling input.
70	I	The current allocation system is broken with a wait list of 9-20 years, a high cancellation rate and a padded waiting list.
70	S	Evaluate the wait list to determine the true size of qualified parties. Develop a system, possibly lottery, with a 3 year wait list. Any trip down the canyon removes your name off the list. Increase winter use during Dec./January.
70	C	There should be no additional user days added to total allocation.
71	C	I support a common reservation pool with a central reservation agency. At the time of reservation a person must declare what type of trip they want: private or commercial. I suggest NPS maintain the current level of use for educational, research, trail and patrol trips. I recommend 3 launches a day for commercial & private sectors combined.
71	C	Regulations limiting group size to 16 for privates and 36 for commercials are ridiculous. The fundamental measurement for impact on the river is the user day. The impact of a large river party on a short trip is similar to that of a small group on a long trip. Impose a limit of 288 user days per trip for private & commercial alike and let them run their trip as they see fit.
71	C	Commercial exchanges need to be stopped simply because of the financial incentive it provides. It encourages helicopter noise in the canyon.
71	I	The private wait list has become too large, making it difficult to secure a permit within a reasonable amount of time. The current 70/30 split does not reflect current demand and is thus arbitrary. Outfitting services are essential to the public who otherwise would not be able to enjoy the river. I do not therefore, advocate a common pool system.
71	S	Adjust the commercial/private split over a four year period starting in the year 2000 by transferring 5% of the total allocated use from commercials to privates yearly to arrive at a 50/50 split by the year 2000. Thereafter, adjust allocation when circumstances dictate.
71	C	Continue to promote access to the river for persons of all abilities. Make all outfitters comply with ADA issues equally. Maintain the current allocation for commercial river companies. Do not charge user days for personal attendants. Increase the cultural diversity of river users. Integrate the disabled into "regular" trips and allow full rosters of disabled people on commercial trips.
69	C	I am a blind individual who has had the opportunity to enjoy the unique wilderness experience of the Colorado River. I know what a profound impact the experience made on my life. Because blind and visually impaired are a small minority, our access to outdoor recreation is often overlooked. Include in the CRMP the right of access for blind/visually impaired and provide for the assistance of a sighted person. Encourage outfitters to satisfy the needs of the blind and visually impaired patron.
69	C	Streamline the permitting procedure for scientific research. Support more, not less, scientific study of the Canyon. Develop a grant program to assist researchers.
14	C	A person cannot begin to comprehend the Canyon/river without combining rafting with hiking in or out and viewing the river from the rim. Do not set limits on the duration of days a trip must last. Keep the 21 days in primary season and 30 in secondary season. The shorter full and half river trip's allow more people the opportunity to explore this national treasure.
14	C	Most commercial trips are shorter and allow a larger number of people the opportunity to raft the river. Outfitters pay a percentage of their profit to the CRF which benefits the private and commercial user. If commercial river use is reduced, fees for private trips would have to increase dramatically to make up the difference.
14	I	Most commercial trips are shorter and allow a larger number of people the opportunity to raft the river. Outfitters pay a percentage of their profit to the CRF which benefits the private and commercial user. If commercial river use is reduced, fees for private trips would have to increase dramatically to make up the difference.
68	C	A fair system is an open reservation system which burdens all users requesting access to a limited resource in the same time frame, be this a common reservation system, or some form of lottery for all users. The current time burden (wait list) on the private user reflects an arbitrary allocation. The commercial and private groups have very different user needs and are not met by an allocation model based on user days.
68	S	Implement a "common reservation system" of use in the 1997 plan initially for use of the river from Diamond to Lake Mead, and adapted for implementation on the entire river system over 5 years. Base allocation on body count, not user days. All applicants declare whether their trip is to be educational, self guided with or without crew, or

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68	S	After a level of acceptable change review, total allocation should be distributed at 20% for each user group: commercial, educational, self guided without crew, self guided with crew, and under served populations. Or, if allocation is based on demand, the resulting ratio would increase private allocation. Increase private allocation by 1500 bodies every year for 4 years, thereafter, review wait time for both private and commercial and then adjust allocation for the next open year.
68	S	Count commercial crew at 25,000 user days, and add an additional 25,000 user days to the private allocation to maintain the current use level percentages. Do not let outfitters double up on user days with exchanges.
68	S	The demand for self guided winter trips has grown dramatically. Encourage equal distribution between commercial and non commercial across seasons. Allow 4 launches per day 4/1-10/15, 2 launches per day 10/15 - 11/15 and 1/15 - 3/31, and one launch every other day 11/16 - 1/14.
68	C	There should be no restrictions on allowing the hiring of people to provide services to a non commercial trip. This type of use will receive an initial allocation of 30% from the existing commercial allocation. Allow trip participants to be credited the going rental rate for the equipment they bring on the trip at the discretion of the trip leader.
68	S	An equation for a common pool alternative: 52 lotteries a year, each lottery = 7 days. If you are not drawn, you get to have your name added 2 times to the next year out lottery. Maximum trip size 18. Five trips/day for 6 months summer season; 2 trips/day for 1.5 mo spring/fall; 1 trip/day for 3 mo winter for a total of 1170 trips per year.
68	I	The current allocation model is not flexible. This inflexibility does not allow access to the Colorado River to reflect demand from the public.
73	I	Maintaining a diversity of river experiences to a more diverse public.
73	S	Increase private and commercial launch offerings for educational trips, lower income groups, etc. Allow private groups to hire guides. No need to maintain the diversity offered by motor trips, as that experience comes with too high a price on the experience of others, and eliminating motors will not impact the range of people who can experience the Canyon because everyone capable of going down the river is capable of being on an oar trip.

## Comments Regarding Fees

### *ID Statement\* Summary*

11	C	Agree with fees as long as the money stays in the Park.
3	I	Current fees are unfair; they do not reflect the costs of services provided by NPS. NPS needs to account for how fees reflect true costs of maintaining resources and providing services.
3	S	Adjust fees to reflect costs of services provided, i.e. \$25 for maintaining name on waiting list is too high. NPS should publish detailed accounting of income and expenses for public information.
22	I	The current system exports concessionaire fees from the Park.
22	I	Fees are different and used differently for commercial and private trips.
22	I	The public is unaware of how fees are used.
22	S	Require a complete audit of fee collection and use. Publish information in Canyon Constituent. Require audit of proposed fee increases before implementing.
22	S	Make all fees equal for private and commercial users, and have them go to the same place.
22	S	CRF for capital improvements should also go to maintenance.
45	S	The outfitter fees should be used for preservation of natural resources. Outfitters should determine how the money is spent.
65	C	The CRF will inevitably be used in ways contrary to wilderness and should be eliminated.
11	C	If commercial use is reduced, the private fees would have to increase to make up difference.
11	S	Increase fees for privates based on competition and commercial practices. Adopt a reservation system for privates with a 40% down payment and penalty for cancellation.
64	C	I don't mind paying a tremendous increase in private boaters fees if these fees are used on the river and to improve boating. Use money to bring water closer to Roy's beach at Phantom and to put a toilet in at Lava.
50	C	The permitting process should cover the cost of administration/ management and should not be used to fund off-river processes or development. A lottery may be the fairest method. Access and permit costs for private trips ought to be in line with commercial trips.
56	I	Current fees charged to private boaters are unfair because they do not accurately reflect the cost of services provided by NPS. For example, it does not cost NPS \$25 year to maintain each name on the waiting list.
56	S	Fees should reflect the costs of services provided. Fees should cover the costs of running the permit system, maintaining the launch and take out areas, patrolling the river, and protect the park's resources. NPS should publish a detailed account of income and expenses on a regular basis.
63	C	The fees are fair for a private trip, but the implementation of the fee structure was not. Changes in fee structure should "grandfather" current waiting list members or announce the changes several years in advance. Fees should be on a scale reflecting higher costs for more people and more days
63	S	Changes in fee structure should grandfather current waiting list members or announce the changes several years in advance. Fees should be on a scale reflecting higher costs for more impact: the more people and the more days, the higher the fees.
44	C	The regulating authority, GCNP, should not be the one imposing any other fee than a simple entrance fee. This creates a conflict of interest. There should not be a monetary filter to the public's right to access public land.
44	S	Discard ALL previous fees including the CRF monies collected from the commercial sector. Live within the budget. Cut out extravagances. Do not add more employees, structures, or services.
65	I	I am opposed to such a huge increase in user fees especially for private trips that are meant to be a much cheaper way to go than commercially.
65	S	Spend any new revenue on education, clean-up, a waterline to the Phantom beach etc, but not on patrol trips.

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- 15 S Firm date 18 months in advance of launch date with substantial, nonrefundable fee. Include all trip member names and fees paid by each person. A person can participate in only one trip a year except each trip should be allowed one repeat boater to ensure experience on the river. Initial registration fees should fund expanded staff to administer
- 11 S Firm date 18 months in advance of launch date with nonrefundable fees. All members of the trip must be listed at that time with fees paid for by each person. Only one private trip per year per person, except each trip should be allowed one repeat boater to ensure that someone on the trip has experience on the river. Registration fees should fund expanded staff to administer system. Preference should be given to small groups in less busy season.
- 5 S Twenty five dollars is a small amount to pay for continuing on the waiting list. Enforce the \$25.00 waiting list fee, drop those who haven't paid, raise the fee to \$50.00 next year. Reallocate unused space on trips with extra launch dates.
- 49 C Keep Lees Ferry historic district remote. Do not build a museum at Lees Ferry. Any building or museum should be at Marble Canyon and not at Lees Ferry. Money to fund a museum should come from private contributions, not the Colorado River Fund.
- 20 C If a waiting list is used for both commercial and non-commercial users, non-refundable deposits should be required for all participants and that money used for NPS
- 18 C The present fee system is confusing, unequally levied to all users of the resource and totally without accountability. Fees should only be levied to support the allocation system and to pay for capitol improvements at Lees Ferry.
- 18 S A single initial filing fee will be assessed to cover administration of the waiting list from time of application to receipt of permit. All people using the resource will pay a single, equal launch fee directly to NPS prior to every launch. A regular public fee review including a true accountability of all income and expenses will be provided by NPS on a bi-annual basis.
- 27 I The fee system is confusing, unequally levied to all users, and does not have any accountability built into the system. The current fees being collected are not being used in an economical fashion.
- 27 S Review the fee structure and see if the increase is necessary. There needs to be justification of the increases. Permit monies could be more economically managed, perhaps by contracting out the permit system.
- 27 C There is inadequate camping and facilities at Lees Ferry. Use money from the permit funds to add better camping and facilities at Lees Ferry.
- 24 I The present fee system is expensive, unfairly levied, unequally administered, confusing and is without accountability.
- 24 S Issue a single reservation fee when the permit is confirmed. All users will pay a reservation fee when launching. Fees must be equitable to all users and commensurate to services received. All fee changes/budget must undergo the public process prior to implementation and there should be an annual public review of all income and expenses.
- 29 I The present fee system is confusing and unequally levied to all users of the resource.
- 29 S Issue a single filing fee to cover administration of the waiting list with all persons paying a single equal launch fee to the Park prior to launch. Send an annual reminder for waiting list participants. Allow ability to get on list at any time. Accept personal checks for fees. Use private vendor for managing waiting list. Have a toll free number. Do not remove someone from waiting list for participation on other private trips.
- 30 I The new fee program results in a cost increase for the average non-commercial trip to \$1600. Non-commercial boaters should not have to pay more in fees than it costs the Park Service to administer.
- 30 S NPS should adjust fee structure for non-commercial trips so that revenues closely mirror expenditures. Sign up and renewal fees for the waiting list should pay only for the administration of that program and nothing else.
- 32 I Fees must be instituted with public input (there was no public participation prior to the implementation of these fees). Fees must be comparable to fees charged to other users and structured fairly so that the fee is commensurate to the services received. Collecting agency must identify the services or activities the fees will support. By singling out noncommercial river running as a "special park use" for 100% cost recovery, GCNP is maintaining inconsistent practices also concluded by a 1995 audit by the Interior Inspector General.
- 32 S Remove noncommercial river running as a special park use. Fees charged should not exceed operational costs and must be consistent with comparable users and with the standard used at other units of the NPS. Eliminate the fee to be on waiting list. A public process must be established that allows the taxpayer to make real suggestions and changes to the fee program.
- 14 C The \$100 fee for the wait list is good. I don't mind a fee to keep my name on the list, but in exchange no one should be removed from the list unless they fail to pay their fees in the appropriate time.

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15	I	Inequitable fee structure. The fees collected should be proportional to noncommercial river use.
15	S	Apply same per-person fee to all users: commercial and noncommercial.
15	I	The fee structure and permit process for noncommercial users violates the principles of equal access for all taxpayers and visitors.
72	C	Paying two separate fee authorities for the same activity is inconsistent with fees charged for comparable uses.
72	S	Every person on a trip applies to reserve a date and pays a reasonable one-time fee, if the person cancels, a new person fills the spot. This would allow for more than one trip to launch w/o exceeding total number for the day.
72	C	I would like to see that future fee systems will not cause the user to be more likely to do a private trip with more people or do less in order to save money.
72	C	We need to know how fees were determined and where the money goes for each fee collected.
72	C	The plan for fees unfairly targets private boaters over commercial outfitters. The fee structure also penalizes those who choose to run solo or in small groups.
72	C	By including river use in the cost recovery program as a "special use", the plan unfairly targets river users over other park users.
66	I	Excessive fees, excess services on rim charged to boaters, government overhead.
66	S	Transfer administration of waiting list to private contractor.
67	C	Any person wishing to run private or commercial should have the same waiting time and be charged the same fees.
67	C	Paying \$25 per year to stay on list is a rip-off. There is no guarantee what it will be when I get on in 7 to 17 years.
66	C	Fees should allow more flexibility in system including refunds and cancellations.
66	I	The fees are too high inequitable between commercial and private.
66	S	Make camping and entrance fees equitable with other uses. Eliminate the launch fee.
39	S	Outfitters use the resource to make a profit, and should pay fees accordingly. Privates are not for profit, and fee structure should reflect actual expenses incurred by their use.
39	I	There is an exorbitant and unfair burden of "cost recovery" fees to the private boating sector in addition to "special use" fees also levied.
39	S	De-classify private boaters as a "special use". The private segment does not place more of a burden than commercial river runners or visitors to the South Rim. Create a new classification or redefine all users of the Park.
41	I	NPS charges unrealistically low fees to commercial companies to transport paying customers through the Canyon. This requires that private boaters, already greatly restricted in their ability to access the river, must pay more than it needs for its permit management.
41	S	Raise the fees paid by concessionaires, decrease the term length of any concession agreement, and use the additional revenue to support overall river activities.
45	I	The main problem with the long wait list is poor organization and management of the list. Raising fees only restricts the park to more affluent members of society.
45	C	Do not increase allocation before seriously examining the system. It is probable that some trips can be combined to shorten the list. Ask those on the wait list if they would like to get on the river sooner by consolidating permits. If fees aren't reduced, spend money fixing the broken system.
45	C	The high costs of a river trip in Grand Canyon is too cost prohibitive for the majority of Americans. Our parks should be accessible to middle and lower income individuals.
48	C	I'm in favor of the new fees or other things that improve private access. I recommend a two name permit and short-small trip option as potential access improvement ideas.
15	C	Increase of fees for private boaters is around 400%. Does NPS intend to ask a 400% increase for commercial outfitters, and if not, why not? What is the justification for the extra \$100,000-\$140,000 over the cost of running the river program?
15	C	Our fees go to pay for Search and Rescue of a few careless boaters. Possibly enact an insurance plan, an optional fee that people can pay to ensure they don't get socked with a big fee if they need an evacuation..

\* I = Issue, S = Solution, C = Comment

**ID Statement\* Summary**

- 14 C A fair and equitable fee system for private permit should be implemented that covers the cost of administration. NPS should set price ceilings in conjunction with their reasonable profit criteria. All commercial companies should be required to offer at least one low-cost trip per year for schools or groups unable to pay the full rate.
- 14 C I don't know where the commercial and private fees go. Use CRF money for some intensive computer modeling with goal of reducing crowding on the river. We need more accountability and public involvement in how fees are used. CRF money worries me because it's allotted for capital improvements. The river doesn't need construction. The best thing for the resource is not to raise fees but to reduce the overall number of boaters. Reduce commercial fees to compensate outfitter's loss of revenue when they have to limit trip size and reduce user days.
- 59 C Keep the same or increase commercial allocation. Reduce the punitive fees which are a regressive "tax" on users of commercial services which are self-regulating and of minimal cost to the agency and resource.
- 6 I A \$25 annual fee to be on the wait list means a person can expect to pay \$250 (based on 10 year wait list) without entering the park.
- 6 S Allow credit of all or part of the waiting list fees toward trip fees. Or increase the allocation of non-commercial trips to reduce the wait list to under 5 years.
- 52 C The paying of fees for certain benefits is not all that bad. What is unpalatable is not knowing where that money is going. Outfitters should not be exempt from collecting and paying the \$4 per day impact fee. The use of these fees for more patrol trips is unwarranted. The river is a self-patrolling system. Resource management trips are beneficial for the most part.
- 20 I There was no opportunity to provide information/comments prior to the implementation of the new fee program. NPS will collect \$480,000 from privates while NPS estimates it costs \$275,000 to manage this use. Privates will pay an average of \$350 while waiting in the 10 year waiting list. Designating river running as "special use" allows NPS to recover 100% of their costs for managing activities that "require written permission".
- 20 S Fees must be instituted with public input, comparable to fees charged to other users, and be structured fairly to reflect services received. The collecting agency must identify the services the fees will support. Remove non-commercial river running as a "special use".
- 17 C Your fee structure is way too complicated and favors rich people.
- 28 I The present fee system is confusing, unequally levied to all users of the resource and totally without accountability.
- 28 S A single filing fee will be assessed to cover administration of wait list from time of application to receipt of permit. All humans using the resource will pay a single, equal launch fee. NPS will provide a biannual accounting of all income and expenses to the public for review.
- 2 C I strongly object to the \$4/night camping fee. Why aren't folks on the rim charged per person for camping. I strongly oppose any expansion of NPS activities (signs, ranger patrols etc) in the river corridor; manage as wilderness. Doubling the noncommercial budget is not needed, wanted or justified. The waiting list fees far exceed the actual costs. At a minimum, wait list participants who are bumped should be refunded the exorbitant fees they have paid.
- 65 C The reservation fees charged by the river office with a new computerized reservation system and web site should be much lower than the recently imposed new fees. No reservation system in the world would charge \$100 just to make a reservation. The current fees are simply inappropriate.
- 67 S Do not allow outfitters to double dip their user days at Phantom and Whitmore exchanges. Channel these user days into the private user day pool. Offer incentives to privates who do trips in the off season, who do smaller trips and who do longer trips. Let private users know where the new fees are going via a detailed quarterly mailing.
- 70 I Fair allocation of management cost should be charged to all users of the park, not unfairly charged to a small problematic (waitlisted) group as is now the case. The fact that commercial users were not assessed the same fees as private users is clear enough, but the same goes for those visiting by car, bus, mule, and other modes.
- 70 S Charge all users fairly without prejudice to their area of interest (rivers, roads, backcountry). The true costs of resource management for the river should be shared by those creating the impact - the water and energy users of Lake Powell and downstream needs.
- 69 C GCNP has an historic opportunity to dedicate money from new fee programs to natural resources. Degradation of habitats and loss of species must be recognized and
- 69 S Fund the Science Center. Fund management techniques, restoration and projects etc that are in all the Park plans including the river corridor. Fund a comprehensive biological inventory and monitoring program.
- 71 C It isn't unreasonable to expect the river unit to pay for itself. I do mind the \$4/day user impact fee monies being spent outside of the river corridor. Boaters and backpackers are being singled out by these fees that should be collected by all users of the Park. Raise the entry fee again or devise a plan to fairly distribute this financial burden.
- 69 C The NPS handling of the fee changes has been a violation of the public trust. Stop the present program and reopen the discussion of fees in an independently-mediated public forum.

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***ID Statement\* Summary***

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|----|---|---|
| 69 | C | I am opposed to any additional visitor center or visitor accommodation at Lees Ferry. If NPS can't figure out what to do with Colorado River and Grand Canyon Conservation Fund monies, increase support for education, interpretation, and scientific studies, not law enforcement.  |
| 14 | C | Most commercial trips are shorter and allow a larger number of people the opportunity to raft the river. Outfitters pay a percentage of their profit to the CRF which benefits the private and commercial user. If commercial river use is reduced, fees for private trips would have to increase dramatically to make up the difference.   |
| 14 | I | Most commercial trips are shorter and allow a larger number of people the opportunity to raft the river. Outfitters pay a percentage of their profit to the CRF which benefits the private and commercial user. If commercial river use is reduced, fees for private trips would have to increase dramatically to make up the difference.   |
| 14 | S | Increase the fees for private trips based on competition and commercial practices. This would bring the wait list for privates in line where it should be. Adopt a Reservation System for private groups with a percentage down and a penalty for cancellation. The balance due 6 months prior to launch date and no refund if cancelled in the last 30 days.   |
| 68 | C | Provide clear evidence showing that private boaters are not paying more than what is their fair share of the cost of maintaining the put-in, take-out, and other resource maintenance. Launch fees should be based on the total head count for the launch. Guides, cooks, swampers etc should be included in the head count. A real campsite at Lees Ferry for non commercial groups launching the next day would be a great place to spend fee demo money. |

## *Comments related to the Noncommercial Permit System*

### *ID Statement\* Summary*

11	I	The rule of only one trip while on the waiting list is unfair.
11	S	Allow people on list to do more than one trip by picking up a cancellation.
11	I	Waiting list for private trip is too long.
11	S	Increase private launches by one or two per day.
11	I	No-shows on the private list hurt opportunities for others to use launches.
11	S	No-shows/no notification privates should be a lifetime ban on reapplying for waiting list.
22	I	There is a disparity between the time getting a private permit and the time it takes to get on a commercial trip.
22	S	Privates should be qualified to get on list. The list gets jammed with unqualified boaters.
22	C	Do not consider a lottery system for privates.
90	C	Prefer that present system is tightened up rather than a complete overhaul or lottery system.
90	S	Cancellations could be moved to 6 months prior to launch rather than the 30 day policy.
11	S	Increase fees for privates based on competition and commercial practices. Adopt a reservation system for privates with a 40% down payment and penalty for cancellation.
64	S	If a person on the waiting list goes on another private trip, delete their name from the list. They can apply for another permit during the following application window. Track the shorter and smaller private trips so that those extra user days can be reallocated.
64	C	It is very unfair that a person on the waiting list can go on only one other trip and then get kicked off the list. If I can schedule my life to go on other trips then that should be OK. Money collected while on the waiting list should be refunded if that person doesn't go. Don't change the length of off season trips (30 days to Diamond).
65	I	The private permit system is unfair. A small group of repeat users have discovered how to manipulate the process, which results in a longer waiting list for everyone else.
65	S	Abolish current wait list system. Establish a lottery or first come first serve system for trip permits 1 - 1.5 years in advance. Require a complete list of trip participants. A name can appear on only one permit application at a time. Increase in private allocation not appropriate if privates are less than 32% of public wanting a river trip. Make sure that privates aren't using paid guides. The NPS must make sure no business or commercial activities are being carried out under the guise of non-commercial.
64	C	A thorough review of the "Noncommercial Use Affidavit" should be undertaken as some of the items are obsolete and inconsistent with the Regional Director's June 1997 memorandum. This could help with the monstrous allocation problem.
50	C	The permitting process should cover the cost of administration/ management and should not be used to fund off-river processes or development. A lottery may be the fairest method. Access and permit costs for private trips ought to be in line with commercial trips.
63	C	The current wait of 8-10 years for a permit is too much. Five to six years is not excessive.
63	S	Allow two private trips to launch per day and reduce commercial trips accordingly. Do not increase the number of user days on the river. Encourage private boaters to take less popular time periods at less expensive fees. Go to a lottery system if the waiting list is more than 10 years. Boaters must reapply every year for dates two years away and permit holders cannot hold another permit for five years. Have a recording announcing cancellation dates and give people on the waiting list a 48 hour window to sign up, then fill the cancellation by lottery.
11	C	We must reassess the problems with the private permit system and the huge waiting list.
11	C	Perhaps private launches could be overbooked based on the cancellation rate from the previous year. The allocation which is being given away in free user days to commercial outfitters who exchange a lot of passengers could be transferred to private allocation. Permittees who have been on the list the longest should have first crack at cancellations when they become available. If data supports it, an across the board cut in commercial allocation may be necessary. Force outfitters to offer reasonably priced commercial
14	C	The private permit system must be structured and operated in the same manner as a business reservation system. It would be unjustifiable to re-allocate use prior to seriously evaluating the inadequacies of the current permit system. Taking user days away from the commercial outfitters for private boaters will not remedy the wait list problem.

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- 14 S With the implementation of the Demonstration Fees, NPS must establish and support a viable reservation system with serious deposits and hefty cancellation policies that will encourage those serious about applying for a permit and discourage those padding the wait list. Both commercial and private boaters should be allowed to go on one canyon trip per year. If someone is on the wait list and they go on a private trip not using their permit, they should go to the bottom of the list. Permit holders must supply a list of participants in advance of their trip. NPS should ask participants if they are willing to take an available cancellation and with what notice.
- 11 S Eliminate restrictions on the number of trips private boaters can take because the more experience a boatman has, the safer the trip and the less impacts from knowing rules and regulations. No designated campsites and no permanent porta pots.
- 18 C Repeat people getting a private permit year after year creates the loud cry that it takes years to get a permit.
- 18 S Set a quota of private trips by using people per day. Conduct a raffle for a private permit. One can apply every year at no cost until he has won. He cannot draw again for three years, nor can anyone who made the trip.
- 15 I There is insufficient staff to run private permit program. The long waiting list prevents realistic planning and causes high cancellation rate. Cancellations favor people who live near the river or live for boating and can go at a moments notice. If only the trip leader's name is listed, some individuals get to go on multiple trips.
- 15 S Firm date 18 months in advance of launch date with substantial, nonrefundable fee. Include all trip member names and fees paid by each person. A person can participate in only one trip a year except each trip should be allowed one repeat boater to ensure experience on the river. Initial registration fees should fund expanded staff to administer
- 18 I The present use allocation is not equitable or fairly offered to all members of the public and conflicts with the 6th and 10th Guiding Principle for the CRMP. Private boaters must wait 10 or more years while commercial passengers can go in less than a year.
- 18 S Adopt a reservation based system applicable to all members of the public on an equal first come first serve basis. Phase new system in over next several years. All people including guides should be counted to a maximum party size of 16. Only one reservation per person private or commercial. Require a substantial financial deposit at the time of reservation in proportion to the number of participants. Confirmation of reservation required 60 to 90 days prior to launch or permit will be forfeited and available to others. No shows lose access for two years. Base system on the number of launches per day. Use adaptive management techniques to adjust the system.
- 19 I It is inequitable that anyone can go on another private trip and still not lose their spot on the waiting list. It is a flaw in the private permit system to assume that everyone will be going for maximum number of days with maximum number of people. This drains potential use of user days by others.
- 19 S If a person goes on another private trip before their name comes up on the waiting list, their name should be deleted from the list. They can apply for another permit during the following application window. Take all available launch dates and divide that number into three groups by size: A: 1-8 people; B: 9-12 people; C: 13-16 people. This will allow more people on the list to access the river in one year and reward smaller groups for the lesser impacts to the user/day system.
- 17 C Keep the permit system first come, first serve and not lottery. Don't kick people off the list if they go on another trip. If you are kicked off the list, it jeopardizes a financial investment ...this should be changed.
- 90 C Tighten up present permit system or go to a lottery system. Move cancellation requirements to 6 months prior to launch instead of one month to give the next person on the list a better chance to prepare for a trip.
- 11 I There is insufficient staff to run the private permit program. The long waiting list prevents people from realistic planning, causing high cancellation rates. The cancellation process favors people who live near the river or who live for boating because they can go any time. With only the trip leaders name listed, some individuals go on multiple trips.
- 11 S Firm date 18 months in advance of launch date with nonrefundable fees. All members of the trip must be listed at that time with fees paid for by each person. Only one private trip per year per person, except each trip should be allowed one repeat boater to ensure that someone on the trip has experience on the river. Registration fees should fund expanded staff to administer system. Preference should be given to small groups in less busy season.
- 15 C The same permit process should apply to everyone equally. Exceptions would be trail/beach repair, patrol, extrication, training, and rescue.
- 49 I The current system restricts those on the waiting list to only one other private trip but commercial clients can go as often as they can afford.
- 49 S Allow those on the waiting list to go on other private trips without being removed from the waiting list. Require both private and commercial river runners to pay \$100.00 per person permit fee. No other fees would be necessary.
- 5 C The lottery system works on most southwestern rivers with low demand for use. The proposed system to let people on the wait list be grandfathered in to a lottery is unfair.
- 5 S Twenty five dollars is a small amount to pay for continuing on the waiting list. Enforce the \$25.00 waiting list fee, drop those who haven't paid, raise the fee to \$50.00 next year. Reallocate unused space on trips with extra launch dates.

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- 49 S Use a reservation based system for the private wait list that could be managed by a private entity. Immediately put a moratorium on the waitlist, and eliminate names who are listed on more than one trip. Shorten up maximum trip length to free up use. Cancellations have to be in writing six months in advance.
- 18 I The present waiting list for private boaters is not user friendly and is discriminatory.
- 18 S Give individuals an option of either a lottery or waiting list, with each option offering 50% of the permits available to the private boater. Make a provision for one or more alternate trip leaders to be identified at least one year in advance. These alternates would be removed if presently on the waiting list. No one shall be removed from the waiting list for participating in other private trips unless as a trip leader. An individual will be removed from the wait list for failure to submit continuing interest form for two consecutive years. Give the administration of the allocation of permits to a private vendor with experience in this type of business and who would provide annual reminders for filing continued interest forms; a website for tracking the wait list; a 24-hour, toll free telephone line; the ability to get on the wait list anytime; the acceptance of personal checks and credit
- 30 I The noncommercial waiting list is too long. The current allocation of user days seems to be unfairly biased against the noncommercial permit holder because commercial trips have much less of a wait.
- 30 S If there are any unused user days in a year, change the scheduling practices to eliminate these. Increase the number of private user days and reduce the number of commercial user days. Less favorable solutions would include making the list harder to get on or stay on either through increased costs or increased requirements for being on the list ie proof of river running experience; adopt an annual noncommercial permit lottery; increase private user days and leave commercial user days the same.
- 33 I The current allocation system is unfair to private users. The boating public should have equal access to that of commercials.
- 33 S Establish a common pool for all users, including commercial. The common pool could be in the form of a waiting list, lottery, or combination. Give equal number of launches to both private and commercial with a maximum party size for both being 16. Consider giving an individual the choice between a lottery or a waiting list, each option providing half of the permits available to the private boater. Allow for alternative trip leaders at least one year in advance of a permit. Reduce the current penalty for a person on the waiting list for participating on another private trip. However, it's not right for a person to go every year. Move administration of permits to a private vendor who would provide 24 hour telephone access with voice mail to check waiting list status, etc and who would accept personal checks and credit cards.
- 27 I Presently there is only one designated person allowed on the permit. If this person becomes ill or has an emergency or for whatever reason is unable to make the launch, the trip is forfeited.
- 27 S Allow a specific number of people to be holders of the permit so that if for some reason one person can't go, the trip isn't cancelled.
- 24 S Every member of the public should have an equal opportunity for access to the Colorado River. Every person seeking to float the river should put their name in the same common pool of users and have the same amount of waiting time. If split allocation method continues, adjust annually to meet changing demand. No lottery. Keep annual use at current level. User Days should not be used as a measurement of allocation. The maximum trip size should be 16 including guides. Trip length and number of users should continue to vary across seasons, but accommodate demand for Winter use.
- 24 C An alternate trip leader may be designated. Name shall remain on list until user leads a trip and not removed from wait list for failure to reconfirm. There should be an annual reminder to file a reconfirmation form, a website so the public can track their progress on the wait list, a toll free 24-hour telephone access, ability to apply for the waiting list at anytime, and one should be able to pay via credit card, personal check or money order.. No sale of private permits.
- 24 S Issue a single reservation fee when the permit is confirmed. All users will pay a reservation fee when launching. Fees must be equitable to all users and commensurate to services received. All fee changes/budget must undergo the public process prior to implementation and there should be an annual public review of all income and expenses.
- 29 I The present fee system is confusing and unequally levied to all users of the resource.
- 29 S Issue a single filing fee to cover administration of the waiting list with all persons paying a single equal launch fee to the Park prior to launch. Send an annual reminder for waiting list participants. Allow ability to get on list at any time. Accept personal checks for fees. Use private vendor for managing waiting list. Have a toll free number. Do not remove someone from waiting list for participation on other private trips.
- 33 I The waiting list is too long for private boaters.
- 33 S Have "common pool" allocation between private and commercial boaters. Penalize private boaters who do not cancel in a reasonable amount of time.
- 33 I Currently there are no safeguards for misuse of the launch reservation system and the fees by the NPS. The wait list has multiple fee schedules and application restrictions that are burdensome.

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- 33 S Privatize the administration of the waiting list with NPS oversight. Use Common Pool system where everyone calls in to reserve a launch date. A single initial filing fee should cover a user friendly waiting list administration with access to a website for list participants, ability to get on the list anytime, accessibility by phone, and acceptance of personal checks or credit card. A regular public fee review should be performed to keep the fees current and realistic. Launch fees should be based on the total head count for the launch including guides, cooks, swampers, etc. Adequately utilize the off season for launches while preserving the range of wilderness experiences represented in the current management plan.
- 45 C Comparisons between commercial and private demand are not meaningful. The greater the change to the current plan the greater the potential for inequity for some groups. Private permit system must support the "values" the public expects/supports for private trips.
- 34 C Each year the wait list gets longer. It behooves NPS to insure that as many different people as possible, within the use guidelines, can participate.
- 34 S Establish a lifetime limit for individuals. NPS should determine the extent to which users making two or more trips are impacting the allocations. If recovery of 10% or more of user days could be achieved then formalize a restriction of one or two trips.
- 38 C The waiting list is still the best way to manage today's high demand for private permits, but the system has many operational problems.
- 38 S Improve the administration of the wait list by safeguarding against its misuse, eliminating restrictions on permit transfers and repeating trips. Improve procedures to assist people seeking cancellation dates.
- 14 C In one year fees have gone from a minor to a major expense for a private trip. While still worth the fees and paper work, it is unfair to remove people from the wait list who participate in another private trip while on the list.
- 14 C The \$100 fee for the wait list is good. I don't mind a fee to keep my name on the list, but in exchange no one should be removed from the list unless they fail to pay their fees in the appropriate time.
- 72 C There is no logical reason why you can only do one trip before your name is removed from the list. It is discriminating.
- 15 I The fee structure and permit process for noncommercial users violates the principles of equal access for all taxpayers and visitors.
- 15 S Increase private allocation, decrease commercial. Revise noncommercial trip regulations and permit conditions. Revise/simplify NPS functions related to fees and permits.
- 15 C The wait for a noncommercial permit is too long. Increase use for privates and decrease commercial use.
- 72 C I am please that the private launch fee has been reduced for small trips, however I am concerned with the exorbitant cost for staying on the list.
- 72 S Every person on a trip applies to reserve a date and pays a reasonable one-time fee, if the person cancels, a new person fills the spot. This would allow for more than one trip to launch w/o exceeding total number for the day.
- 72 C A new system for managing private permit applications should be instated and given a trial period before any user days are taken from the commercial outfitters.
- 72 C Private boaters are unable to obtain permits in a timely manner. I can pay thousands of dollars to an outfitter and go as often as I can afford.
- 72 S Book trips for people who are committed to an actual date; private and commercial. Don't allow trip leaders to hold up to 15 spaces, more for commercial. Let's have committed people get to the river.
- 64 I The NPS definition of private trip has an unrealistic view of "shared expenses".
- 64 I Waiting list is too long.
- 65 I Waiting list too long - an 8 year wait is ridiculous.
- 66 S Eliminate the penalties for participating on other trips.
- 66 S Make permits transferable. It's hard to predict circumstances 10 to 16 years in advance.
- 66 S Transfer administration of waiting list to private contractor.
- 66 S Establish a freedom of choice pool for 1) all users, and 2) for trip leaders, and determine passenger list one year prior to launch.
- 67 C People who are able to pick up cancellations do not abuse the system.

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**ID Statement\* Summary**

67	S	Allow more off season trips, make it easy to call in for cancellations
66	C	Fees should allow more flexibility in system including refunds and cancellations.
66	S	More Permits for privates and reduce waiting time. Manage launches by user days not number of launches.
65	S	Have a lottery system instituted over three to five years.
66	S	Eliminate penalties for people on the waiting list if they go on another trip. Let more permits go each year.
67	I	Inequitable launch dates options commercial vs. private
67	S	All users should reserve launch dates including those well in advance.
67	I	Unequal access due to repeat commercial trips
67	S	Adopt non repeat guidelines as to trips and lengths of time
66	C	The penalty for taking more than one private trip before being eliminated from the list is unfair.
64	S	Set up launch requirements and sort by trip size and length.
44	C	It is possible to achieve a reasonable waiting time without changing the current allocation.
44	S	Create committee to research issue of waiting list, maintain current allocation level.
67	C	Regardless of the wait list or user fees, the permit system has become the most inefficient method of issuing permits imaginable. No one in the commercial sector could survive with such a system.
64	C	Equipment credit should be given to anyone who uses it, compensation should be similar to rental gear rates. No restrictions on hiring cooks, etc., on private trips.
64	S	Allot private launches with trip numbers and user day numbers in mind. Max. of 16 per day, but could be made up of more than one trip. Schedule more trips in the off-season. Use lottery.
10	I	The wait list is too long. Repeat users with friends and families dominate the list.
10	S	Add more launches and place into a pool for 3 years. Use a weighted lottery (like for hunting) to access those new dates. Person may choose to do the lottery or keep place on list.
10	C	Use shoulder seasons to increase private use. If the ratio of commercial to private use is changed to increase private use, more boats would be on the river at once which would increase crowding. Limit layover days and reduce maximum trip length for privates to allow more permits to be issued. Make the permit system fairer, but common pool or lottery system would be chaotic and easily manipulated by a small group of individuals.
39	I	The wait list is extraordinarily long and unfair for private permit hopefuls. No transferability of permit after long-term, high emotional and financial investment. Loss of placement on list after 2 other trips taken during this long wait.
39	S	Gradually move to a system where commercial and private make a reservation through an office (either NPS or contractor) for a future date and a limited party number. Failing that, allocation should be increased a substantial amount to the privates and reduced to the commercial. Include commercial staff in user day count. Abolish 2 trip limit for those on wait list and make permits transferable to any person in the party, who then would be removed from the wait list if already on.
47	I	Only allowing one private trip while waiting on the private boater wait list and being removed from the list if you participate in a second trip is financially unfair.
47	S	Do not limit the times you can participate in private trips while on the waiting list.
45	I	The main problem with the long wait list is poor organization and management of the list. Raising fees only restricts the park to more affluent members of society.
45	C	Do not increase allocation before seriously examining the system. It is probable that some trips can be combined to shorten the list. Ask those on the wait list if they would like to get on the river sooner by consolidating permits. If fees aren't reduced, spend money fixing the broken system.

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- 45 C It is commonly asserted that the waiting list represents double, triple, or quadruple counting due to the fact that one may have several friends also on the list with whom one could do a trip while waiting.
- 45 S Abolish the wait list and go to a weighted lottery system or qualify people on the wait list as having some river experience and at least 18 years old.
- 45 S Provide computer networking that can place small privates with other small privates who desire to do so. This will reduce the incidence of group contact, make more starts available to privates and may enhance safety in big rapids. Commercial group size of 36 means less campsite conflict, more choice of smaller camps with less impacts for privates, and less incidence of group contact.
- 48 C I'm in favor of the new fees or other things that improve private access. I recommend a two name permit and short-small trip option as potential access improvement ideas.
- 48 I The primary issue related to the private trip waiting list is fairness, or the lack thereof. A small group of repeat users have discovered how to manipulate the permit application process, which denies access and forces longer waits than necessary to the majority of private permit applicants who play by the rules.
- 48 S Have strong disincentives for frivolous permit applications. Gather and release pertinent data related to the current system ie how many repeat applications are on the wait list? Allow more than one name on the permit. Collect more of the fees up front, forfeit if cancelled. Create a use survey and database from every person who leaves Lees Ferry in 1998.
- 11 I Insufficient staff to run the permit program. Long wait list prevents realistic planning and causes high cancellation rate. Large cancellation rate favors people who live nearby and those that can go at a moments notice. Assumption that each name on list represents 15 people, limits flexibility of trip size and encourages repeaters. With only the trip leader's name listed, individuals go on multiple trips.
- 11 S Firm date 18 months in advance of launch date, with nonrefundable fee, all trip members listed and fees paid for each person. Only one private trip per year except each trip should be allowed one repeat boater to ensure someone has experience. Fees should fund expanded staff.
- 11 C The current waiting list system is not user friendly and unfair. Problems are: Applications are only taken in February; No alternate leader on permit which forces all people interested in going together to submit permits; \$25 fee to stay on list is unreasonable especially with a 15 year wait; The two strikes and your out rule is unfair and not imposed on commercial passengers. It is impossible to reach a person in the permit office.
- 11 S With the huge increase in fees there is no justification for allowing permit applications only in February. Allow alternate trip leaders on application. Eliminate the \$25 fee to stay on wait list, if money has to be charged to stay on list, make it payable 30 days after receiving a launch date. Eliminate the two trips and you're off the wait list rule. Run the permit office like a business or contract it out.
- 67 C Being taken off the waiting list after 2 private trips is not fair.
- 88 C Abandon the restriction on the number of trips a private boater can participate in. Establish a larger equipment reimbursement allowance. Privatize the waiting list administration with NPS maintaining oversight. Evaluate fee requirements and charge everyone equally. Provide evidence that private boaters are not paying more than their fair share. Base launch fees on total head count for the launch.
- 18 I A small group of repeat users have discovered how to manipulate the private permit process, which denies access and forces longer waits than necessary to those playing by the rules.
- 18 S Abolish the waiting list system and replace with lottery or on first come, first serve system that accepts applications no more than a year to a year and a half in advance. Applications should have all prospective trip participants listed, and a person can only appear on one permit at a time.
- 7 S Establish a Common Pool system to create a "level playing field" for all those desiring a river trip. Current system fosters a huge, expensive bureaucratic nightmare of requirements, deadlines, complicated fee schedules that discourage private trips and fosters a commercial monopoly.
- 18 S Reduce the size of the waiting list maybe by capping annually how many people are allowed on the list. Limit the number of times per decade an individual can go on a private trip. Extend the time limit on permit cancellations to 4 or 6 months to better allow diversion of cancelled trip to others on the wait list.
- 32 I The wait for a permit is too long and there are too many cancellations of permits.
- 32 S Make private users more accountable by requiring a refundable deposit of \$400-\$500 per permit. If trip is cancelled the deposit is not refunded. Have an alternate trip leader named on each permit.
- 19 C The wait list is being padded by those who know how to work the system. The wait list is inflated by river runners who don't have their own equipment or have the necessary experience to actually lead a Canyon trip, and by listing as trip leader every person in a given family.

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**ID Statement\* Summary**

- 19 S Tighten up on wait list qualifications by equipment, experience and age. All private trips must be non-motorized, trip leaders must own their own equipment. One trip per year per private trip participant, whether trip leader, passenger, or boatman. Must be 18 to be on wait list. Permit holder must be the trip leader.
- 20 S Use ceilings are a necessary management tool to preserve the river resource. A management system must reflect demand, and be flexible so access opportunities can adjust, can not be manipulated by users/outfitters, is simple for the applicant and efficient for management, does not undermine nor guarantee profit for outfitters. Experiment with the Common Pool system and privatize the wait list to reduce overhead and prevent abuse.
- 10 I The private permit and wait list system does not work, and is subject to abuse by those who can play it.
- 10 S Make applications for permit good for only 2-4 years, with all applications placed in a pool and permits given on a blind draw. Have trip size determined at time of application. Remove from pool of applicants those who have gone down river within 2-4 years. Offer cancellations by drawing, but not subject to dropping from pool by refusal or inability to take.
- 17 C Keep the wait list. A yearly lottery would be a huge pain as people need a year to plan. Keep a call-in cancellation for people who can get it together on short notice. It is in the NPS best interest to have experienced people on private trips. You need more double launch days. Most people would rather have more encounters than not get to go. More private launches are a must
- 18 C Administration of permits should include an annual reminder to file reconfirmation form, a website to track wait list progress, a toll free 24 hour telephone line, accept payment via credit card, personal check or money order.
- 23 S Every person or group wishing to float the Colorado may apply for a permit to do so. They may then hire a guide from a list of guide services approved by NPS. All are required to follow same rules regarding safety and protection of the Canyon.
- 28 S Every member of the public should have an equal access to this public resource. Use a common pool system. If one person must wait, everyone should wait their turn. Give private boaters the same number of launches with same number of participants as outfitters. Make maximum party size 16. Make provisions for an alternate trip leader on private trips. Do not remove person from wait list for participating in other trips. Give permit system to a private vendor.
- 36 I A person on the waiting list is currently allowed only one private river trip before their name is removed from the list.
- 36 S Allow people on the wait list to participate in more than one private river trip before removing their name from the list. By taking private trips one can increase one's knowledge and skill level thus becoming better prepared to be a permit holder/trip leader on their own trip.
- 37 C Private demand seems to far outstrip supply. Wait list seems unconscionably long.
- 37 S Gather more data on private repeats. Fine tune the system so that those on the list longest have the best possible chance at cancellation. If commercial/private shift is necessary, do it gradually. Use CRF money to buy companies out at a fair price when outfitters want to sell.
- 57 S Eliminate the current waiting list system in favor of a yearly lottery system. It is cheap to administer; it provides quick notice to the applicants re: time slots available. It is cheaper for applicants who don't have to pay extra money to stay on the wait list.
- 51 C There are private individuals who manipulate the permit system which results in long delays for other people on the list. Fine tune the system to allow more equal opportunity for private trips.
- 20 C If a permit is issued and a fee charged, you should have a minimum cancellation of 60 days ahead of time and then re-issue the permit to the next person on the list, not to the locals. More info needs to be put out on the wait list and cancellations. The allocation is more than fair to the commercials vs the privates.
- 14 C The waiting list works very well if you are willing to get out and network with other private boaters and dial in for cancellations. I would hate to see the basic idea of the current system change. There needs to be a way to cancel and a way for those days to be used that season so days aren't wasted. Don't limit , or limit to one trip per year, private boater's repeat trips. Their experience is important to have for leadership and skill.
- 2 S Change the allocation amounts so there is not such gross favoritism granted to commercial permits. Do not increase the number of overall river travelers. Take a portion of the private wait list (30%) and make it a lottery.
- 68 C The nontransferable permit is a hardship for many, especially since you have to pay an annual \$25 fee. Have an alternate trip leader on the permit application so that if for some reason the leader cannot go, the permit can be transferred to the named alternate.

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- 70 C We recommend a permit lottery system for both private and commercial river users. The permit holder can decide to do a private trip, hire a guide or hire a commercial outfitter. Decrease the group size to ten and decrease the number of user days on the river by 5% per year over the next five years to increase the wilderness quality. Limit the number of trips per person (excluding guides) to one per year and a maximum of four trips in 10 years.
- 70 C Permit cost should be based on the number of individuals on the trip with a minimum charge based on six and maximum of ten persons. This charge should pay only the costs of administering the permit system and guide licensing system. Any cancellation within 60 days of launch should be non-refundable.
- 65 C We object to the present unnecessarily long wait to obtain a noncommercial permit. There is a critical need to sort out who is going with whom, and determine to what extent all these trip reservations represent real people and not just blank spaces.
- 65 S The river office should have a web site on which trip leaders type the individual participants' names and phone numbers into a form. The river office computer should receive and hold these lists and check for completeness and duplications. People willing to go at less popular times should have a shorter wait than those wanting to go at more popular times. Reserve space only for specific people on specific dates.
- 27 C There is no person or cause that is served by allowing the length of the list to increase while the private permit system is being improved. The list should be frozen until a new system has been designed. Meanwhile issue permits to those on the current list.
- 67 C Private users have an ever increasing hassle financially and bureaucratically of obtaining a permit that is way out of balance with the commercial sector.
- 67 S Do not allow outfitters to double dip their user days at Phantom and Whitmore exchanges. Channel these user days into the private user day pool. Offer incentives to privates who do trips in the off season, who do smaller trips and who do longer trips. Let private users know where the new fees are going via a detailed quarterly mailing.
- 70 S An individual or small group permitting process should be encountered by all. The permit holder will decide to go private or hire an outfitter or guide. Have a standard allotment of 20,000 travelers a year. Keep group sizes at maximum 16 on private trips and 32 including guides on commercial trips.
- 28 C The wait for a private permit takes too long. The system has become hard to manage and allows abuses. Don't throw out system, just overhaul.
- 28 S Allow only one applicant per address/phone number or social security number. Extend cancellation period to 150 days prior to launch, but increase penalty for withdrawing except for emergencies. Make it easier for people next in line on the list to go.
- 71 I It has become too difficult, burdensome, costly and unfair for private river runners to obtain a permit for the Colorado River.
- 71 S Redistribute use between private and commercial boaters so that privates receive a greater percentage of use, perhaps 50/50. I don't advocate "freedom of choice" where privates and commercials compete equally for access.
- 71 C Increase the number of private launches per year; maintain the waiting list with the first 250 people in line that year and increase this number by 50 launches drawn from a lottery of the remainder of people on the list. This is only acceptable if there is mitigation for wildlife and environmental impacts.
- 14 S Increase the fees for private trips based on competition and commercial practices. This would bring the wait list for privates in line where it should be. Adopt a Reservation System for private group's with a percentage down and a penalty for cancellation. The balance due 6 month prior to launch date and no refund if cancelled in the last 30 days.
- 68 C There are currently no safeguards for misuse of wait list by the overseeing agency. Privatize the waiting list administration to a company with a proven track record in this business, with NPS oversight.
- 68 C There are no current safeguards to insure financial protection to the wait list participant. Credit 100% of the fees debt incurred to any individual who could not participate in a river trip. A deposit of 50% at time of reservation would insure applicant sincerity. The remaining 50% would be due at the time of launch.
- 68 I The current system restricts the self guided participant in their ability to participate in other self guided trips, thus restricting the knowledge of the resource. This restriction penalizes the individual for even being on the list, while the commercial patron has no limits to the number of trips they can participate in.
- 68 S No one shall be removed from the permit list or reservation system for participating in another leaders self guided trip(s) prior to the launch of their own trip.
- 68 I The current wait list has multiple fee schedules and restrictions as to application and continuing interest time lines that are burdensome. Implement a single initial filing fee to cover a user friendly waiting list administration. This would include contacting each person with a continuing interest form, a website for the list so participants could see their position, and easy access by phone. Personal checks and credit cards should be accepted. Removal from the list occurs only by requesting removal.
- 68 I The current system does not allow for a lottery in yearly trip availability. Any lottery system must include both commercial and private users.

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***ID Statement\* Summary***

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| 68 | S | Institute a choice system with the option to choose either a weighted lottery or a reservation list such that 50% of the new permits available to all users from a redistribution of the allocation are filled through the use of a weighted lottery. If the current allocation is kept in place, then the waiting list should also be kept in place.          |
| 68 | C | There should be no restrictions on allowing the hiring of people to provide services to a non commercial trip. This type of use will receive an initial allocation of 30% from the existing commercial allocation. Allow trip participants to be credited the going rental rate for the equipment they bring on the trip at the discretion of the trip leader. |

## ***Comments related to NPS Management including Regulations, Operations, and the CRMP***

### ***ID Statement\* Summary***

22	C	NPS patrols do not enhance guest's experience.
22	C	NPS camp inspections should include interpretive talks to visitors.
45	C	Do not require a NPS interpreter on trips; this would detract from the adventure. Provide interpretive training for guides.
65	I	NPS is inconsistent in interpretive training requirements for guides and NPS interpretive staff.
65	S	Eliminate the education requirement for commercial river guides.
65	I	NPS high profile law enforcement style is inconsistent with wilderness values.
65	S	NPS should reevaluate current procedures on law enforcement contacts and find tactics that augment wilderness and educational values.
65	C	Outfitters have a monopoly on guided services which are expensive and enforced by the government.
65	S	Eliminate government enforced monopoly. Allow people to hire who they want to take them on trips.
65	C	There is a demand for alternatives to private and commercial trips. Some privates would have better trips if they could hire guides.
65	S	Legalize private trips hiring guides.
65	C	Drug testing requirements are unconstitutional.
65	S	End government mandated drug testing of commercial guides.
11	I	Lack of relevant and needed data on which to base decisions. It is hard to come up with solutions without reliable facts on the waiting list and carrying capacity.
11	S	Provide more information to define issues so solutions can be achieved.
14	I	There is no firm long-term guidance that guarantees that wilderness management of the river will continue. Over-regulation severely impacts the visitor experience and increases costs for the river user.
14	C	Reduce regulations to reflect wilderness philosophy. Implement self-policing methods to reduce law enforcement encounters. Guns should be for emergency only, minimize technology such as satellite phones.
14	I	Preservation of trip variety and personal attention for commercial passengers. There is a trend towards focus on big business and less on visitor experience.
14	S	Reduce the size and power of commercial outfitters and NPS regulators. Set a limit on the size of commercial permits to 5,000 user days. Throw out the prospectus process. Eliminate excess regulation: develop partnerships to ensure resource protection and visitor experience.
64	C	A thorough review of the "Noncommercial Use Affidavit" should be undertaken as some of the items are obsolete and inconsistent with the Regional Director's June 1997 memorandum. This could help with the monstrous allocation problem.
11	I	The high cost of commercial trips is increasing the demand for private trips. Some commercial prices are significantly more than what would reflect a "reasonable profit". The problem is exacerbated by the sale of user days when river companies have been transferred. User days are not the property of commercial outfitters and cannot be sold, yet NPS has approved payment of such items as "noncompetition clauses which clearly reflect the sale of user days.
11	S	NPS should not allow the sale of a company to proceed when the price obviously includes the sale of user days. Outfitters should make a reasonable profit, not a colossal one. Consideration should be given to the smaller outfitters that they may remain commercially viable in order to continue to offer a diverse range of commercial trips.
11	C	The increasing number of rules, regulations, law enforcement and technology are inconsistent with wilderness values and management, are largely unnecessary, and can negatively impact a visitor's experience.
11	S	NPS should be managing the river corridor as proposed Wilderness, with as little overt regulation and law enforcement presence as necessary. This should include utilizing "minimum tool" in regular patrols, which excludes the use of motors. The river unit should be a part of the Science Center rather than the law enforcement division. Recognize, maintain, and encourage the interpretive and self-regulatory role of river guides in the Canyon.

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**ID Statement\* Summary**

11	S	Eliminate restrictions on the number of trips private boaters can take because the more experience a boatman has, the safer the trip and the less impacts from knowing rules and regulations. No designated campsites and no permanent porta pots.
15	I	The river office personnel are over-tasked with duties unrelated to the river corridor.
15	S	River permit office personnel should have no other duties except manage the commercial and private permit systems, and other projects related directly to the river.
65	S	Spend any new revenue on education, clean-up, a waterline to the Phantom beach etc, but not on patrol trips.
65	I	The drug testing policy for guides is not right and an invasion of privacy. Most guides have only the health insurance and retirement they provide for themselves. The increasing number of government agencies involved in managing Grand Canyon are often confusing and have contradictory policies.
65	S	Eliminate mandatory drug testing. If an individual business wants to require drug testing, that is their right, but not the right of the NPS. If NPS is going to control every facet of river business, why not require outfitters to provide health insurance and retirement plans for guides. Eliminate the multi-layer control at Grand Canyon by several government agencies and have NPS control and manage Grand Canyon.
47	C	Current policy is doing a fine job of running the canyon scene.
49	C	NPS river patrols could perform resource projects and check adherence to operating requirements. Years ago, patrol trips served this dual function, which created positive interaction between NPS and the public.
49	C	The NPS should cooperate with the tribes whose land border GCNP in establishing a buffer zone to protect the resource from development and other impacts.
49	S	A percentage of all entrance fees would go to the Tribes to establish a buffer zone, create a cultural awareness program, staff resource protection personnel, and improve park and Tribal relations.
20	C	Twenty plus years of advertising has created more demand than the commercial outfitters can fill. Creating even more demand can only hurt the resource and drive prices higher. Commercial outfitters should be banned from more advertising.
27	C	There is inadequate camping and facilities at Lees Ferry. Use money from the permit funds to add better camping and facilities at Lees Ferry.
24	C	Develop guidelines to allow the use of paid licensed guides on public recreational river trips.
33	I	There are private users who would like to include employed individuals such as cooks, musicians, geologists, crew etc.
33	S	There should be no restriction on allowing the hiring of people to provide services ie cook, licensed guides etc to a private trip. The hired people would get counted in the population of the permit and be at the discretion of the trip leader.
14	C	My main concern is what is best for the Grand Canyon - this should be the final goal for every equation of change proposed in this process. The current system could be made better with some minor changes. Invite some private boaters to participate in further brainstorm sessions, conference calls etc as you continue on the planning process.
37	C	While we may agree that some limit of number of people on the river is essential, it is not at all clear what that limit should be or how it should be measured. Biological impact probably would not increase significantly over all even if the number of people per year were doubled or tripled. NPS, by failing to institute an aggressive off-limits campsite and attraction program, has ignored obvious restoration opportunities.
54	C	Increase fines for non-compliance of fire pan and porta potties to reduce recreational boaters impact in lower gorge.
53	C	Have comment cards available at the end of all river trips to help the NPS evaluate the resource, visitor experience, etc. I think the system now is excellent.
38	S	Extend NPS pre-trip orientation lectures to all commercial guests at Lees Ferry.
16	I	The definition of a noncommercial trip is so loose that a growing number of quasi-commercial trips are using the noncommercial allocation. This increases the average trip size, and number of genuine trips which can launch is decreased.
16	S	Develop a clear definition of noncommercial use. Invoke substantial penalties for violation of rules. Forbid motors for noncommercial trips. Forbid noncommercial use when everything is provided by rental service.
15	I	Excessive NPS enforcement policies and activities involving noncommercial users, and lack of comparable policies for commercial users.
15	S	Revise/simplify enforcement policies involving noncommercial users in collaboration with a panel of noncommercial users.

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**ID Statement\* Summary**

19	C	As managed as wilderness, NPS should be required to use minimum tool regulations in the backcountry and river corridor.
64	I	The NPS definition of private trip has an unrealistic view of "shared expenses".
66	C	Outfitters charge too much for commercial trips. NPS should have more control of pricing, and require outfitters to offer low-cost options.
66	C	Launch briefings should be given to commercial passengers as well as private. This could be done by a private company (rather than NPS or outfitters).
60	C	The CRMP must address the invasion of quiet by overflights.
66	C	Reduce enforcement and bureaucratic presence on river.
64	S	Allow guides to work two noncommercial trips for pay.
44	I	Increasing regulations and outside regulatory agencies diminishes the flexibility and quality of trips.
44	S	Resource and education patrol, no evaluation patrols, establish guidelines not regulations. NPS or resource trips should use minimum tool.
64	C	A certified GC guide should be allowed to work 2 noncommercial trips a year if requested.
64	C	Equipment credit should be given to anyone who uses it, compensation should be similar to rental gear rates. No restrictions on hiring cooks, etc., on private trips.
66	C	Review of science trip proposals should include private boaters. NPS should allow privates to outfit trips.
39	I	Privates are strictly prohibited from hiring any person to perform a service for their trip. In contrast, commercial customers hire someone to do everything for them.
39	S	Allow privates to hire someone to perform services (cooks, guides, boatmen).
47	I	Stewardship is haphazard. There is not enough data on people and use. There is too little research on environmental and cultural issues.
47	S	Certify river users and leaders, require service by river users, and increase fees to support restoration. Research river users through the permitting process. Fund and give priority to archaeological and other studies to determine impacts.
54	C	I have experienced a private trip driver impaired by alcohol, seen private kayakers get injured at Lava and rescued by motorized commercial raft, private trips washing and relieving themselves in the side canyons/water runoffs. In 15 years I have never observed a commercial boatmen engage in or permit any of the foregoing, instead imparting detailed attention to safety and environmental responsibilities.
88	C	Manage the Canyon as a proposed Wilderness and Park personnel should use minimum tool regulations in back country and river corridor. Contacts should be minimal and friendly in nature.
24	C	It is near impossible to ask questions of a real person at the park. Revamp your phone message system and make a real person available. It is good that fees are being charged for back country permits.
52	I	Private river runners don't have the ability to hire a guide which may be the most important person/item on the list. A person hired to guide the private trip may save the trip or lead it to a higher level of safety and enjoyment.
52	S	Allow the hiring of guides that meet the qualifications for "Qualifying Boatman" for GCNP private trip requirements.
52	C	The paying of fees for certain benefits is not all that bad. What is unpalatable is not knowing where that money is going. Outfitters should not be exempt from collecting and paying the \$4 per day impact fee. The use of these fees for more patrol trips is unwarranted. The river is a self-patrolling system. Resource management trips are beneficial for the most part.
13	C	If NPS requires outfitters to drug test their employees, these employees should also be provided with retirement plans, health insurance and other benefits. The present level of NPS river patrols should not be exceeded.
37	C	There is absolutely NO reason for any NPS personnel to ostentatiously display weapons of any kind downriver. People should and do feel safe in the Canyon. De-emphasize law enforcement profile until it's needed. If you have weapons on the river carry them out of sight.

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- 15 C From safety, waste removal, history, water lore etc., the guides were ardent proponents for the people on the trip and the special place they were traveling through. I greatly respect the NPS for its guardianship of the park but the self-styled expertise is a bit much to take. The NPS's place is to monitor and check the river. Leave the river/canyon to the river runners.
- 2 C I strongly object to the \$4/night camping fee. Why aren't folks on the rim charged per person for camping. I strongly oppose any expansion of NPS activities (signs, ranger patrols etc) in the river corridor; manage as wilderness. Doubling the noncommercial budget is not needed, wanted or justified. The waiting list fees far exceed the actual costs. At a minimum, wait list participants who are bumped should be refunded the exorbitant fees they have paid.
- 70 C There is an increase in bureaucratic control on the river with increase in NPS law enforcement and involvement of other agencies like Coconino Health Dept. and Coast Guard.
- 70 S NPS should minimize law enforcement and maximize education. Recognize and encourage guides as self regulating, good teachers and stewards of the resource.
- 52 C Using the Social Security number as an ID# or as identification is illegal. It is unlawful for any government agency to require the SS# as ID. Voluntarily is a different matter. The private permit form should state the use of a 7 digit ID#, not the first digits of the SSN unless the applicant chooses to use their SSN.
- 69 C The NPS needs to adopt a strong, pro-active, scientifically credible, and regionally-based approach to managing the river corridor's physical, natural and socio-economic resources and processes. NPS has repeatedly been criticized for failing to perform and use credible science in its management. The NPS should not perform research or monitoring activities. All scientific activities should be carefully overseen by qualified (PhD level) scientists.
- 69 C Streamline the permitting procedure for scientific research. Support more, not less, scientific study of the Canyon. Develop a grant program to assist researchers.
- 69 I NPS needs to improve its responsiveness and accountability to the river running public as it strives to accomplish its mission.
- 69 S Open all beaches in the vicinity of Phantom Ranch to camping by river runners. The NPS has over-emphasized law enforcement in the river corridor. Either completely reorganize NPS approach to river patrols, or better, contract out patrols to river guides. An exception to this is in the arena of search and rescue for which NPS can be commended. Grand Canyon does not have the right to license river guides if the State of Arizona does not require such licenses.
- 69 C I am opposed to any additional visitor center or visitor accommodation at Lees Ferry. If NPS can't figure out what to do with Colorado River and Grand Canyon Conservation Fund monies, increase support for education, interpretation, and scientific studies, not law enforcement.
- 68 C The presence of other individuals the river explorer encounters, how those encounters occur, can be productive or counter productive. In that Grand Canyon is managed as a wilderness experience, NPS personnel should be required to use minimum tool regulations in the back country and on the river. Contacts should be friendly and minimum in nature.



## Comments regarding Resources Management

### ID Statement\* Summary

2	S	Consider assigning camps to commercial users during the peak season months and make that information available to the privates. Rotate popular camps so the commercials don't always have a lock on them. Spend some of the new fees on improving camps down below Separation. Make these camps for non-motorized crafts only.
5	I	Layover days frequently defeat attempts for on-river communication, re: at campsites since there is no way an upstream group can know a downstream group is laying over. This can lead to conflict especially in areas with few campsites. Layovers are also environmentally unsound: they increase beach use time and delay beach cleanup.
5	S	Eliminate layovers at 5 to 10 high use campsites during the summer season.
14	I	There are too many people boating the river causing overcrowding at attraction sites, competition for camps, and overall resource damage, especially during summer months.
14	S	Reduce commercial group size to 16, or compromise to 25 including crew to increase quality experience and reduce trampling of plants and archaeological sites. Go to a launch based system for outfitters reducing total number of user days currently allotted. Organize launches by trip length to reduce encounters and reward longer trips with fewer exchanges.
15	C	Glen Canyon Dam represents the ultimate negative impact on the river through Grand Canyon and should be removed. Doing so would free up 200 miles of river recreation, possibly lessening the demand on Grand Canyon.
16	I	The carrying capacity of the river needs to be reassessed.
16	S	Use modeling to determine launch scheduling so bunching does not occur, and increase in river days may increase. Collect data and reassess.
17	C	Encourage or mandate the use of cleaner, more quiet outboard motors to reduce impact of man on the river. Enforce "Take only pictures, leave only footprints."
20	C	Manage the Colorado River as wilderness or at least potential wilderness.
22	S	Decrease trip size to 28 including guides.
26	C	I am concerned that the protection provided by Wilderness designation will not be pursued by NPS for the Colorado River because of the special interests of the commercial motor companies. The NPS mission is not about producing profit nor does the NPS have to meet all the demands of the public for use of the resource if doing so conflicts with the priority of protecting and preserving the natural and cultural resources.
47	C	Current policy is doing a fine job of running the canyon scene.
50	C	Protecting the natural resources in the canyon is primary. The impact of recreation on the physical and biotic resource, the natural quiet and the human interaction in the canyon should be considered. Jet skis and trail bikes are out. The ratio and density of large trips should not degrade the quality of other trips by noise and overuse of
59	C	The vast majority of private users have less experience with the Canyon than commercial users, are more likely to have difficulties with the required waste removal and safety practices. Most people who desire to use the Canyon are physically and mentally not capable of enjoying this resource without commercial guidance, whether through using an accompanying person on a private trip or a commercial river runner.
60	C	This great natural resource should never be harmed and within reason, never be denied the American public. The dam controlled flow has had a beneficial affect ie the water is clear, habitat for trout, vegetation has expanded to the high water mark.
63	C	The smell of urine was the worst problem encountered. Each trip should be required to carry a pee bucket and or people should pee directly in the river.
63	C	The ecological integrity of the area is the most important single factor that the NPS should consider. Pressure from commercial companies and private boaters should not deflect NPS from that aim.
65	S	NPS should do trail work where habitat preservation is necessary and stop there.
65	I	Is current level of trail improvements/maintenance along river corridor appropriate?
65	S	Specifically define "non-native", and re-evaluate policy on removal/control program.
65	S	Be more stringent in determining which research projects are allowed on the river. Emphasize winter research, do not allow them to use high use areas, and clean up after themselves.

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***ID Statement\* Summary***

65	I	Research trips are too prevalent and impacting leaving flagging, etc., and affect crowding.
65	I	NPS efforts to remove non-native plants are ineffective.
66	C	The CRMP should protect the values of beauty, remoteness, wildlife, and ruggedness, and place necessary limits on users so that the river ecosystem is not damaged.
88	C	Abandon idea of designated camps along the river. Don't add more facilities ie port-a-pot. However, a potable water source near boat beach at Phantom would be nice.
90	S	Maintain group size for privates at 16. Reduce commercial group size to 25.
10	C	It's not necessary to assign camps or attraction site times at this point, but larger campsites should be reserved for larger groups.
11	C	I agree with the proposal of the river corridor as a Wilderness Area, and low impact is my major concern.
11	C	Clean up the Marble Canyon damsite.
14	S	Do not increase or decrease the number of people on the river.
14	C	A wilderness experience on the river is everyone's goal but in reality we have to make compromises in order to protect the canyon and river and control trampling, over crowding, etc.
14	S	Do not increase or decrease the number of people on the river.
14	C	A wilderness experience on the river is a goal, but in reality we have to make compromises in order to protect the canyon and river and control trampling, overcrowding, etc.
14	C	The river from Lees Ferry to Separation should be designated Wild & Scenic. The river corridor should not be designated Wilderness if motors have to be eliminated. Motorized craft provide a viable option for a broad section of the public wanting a river trip. All other possible areas of the park should be designated Wilderness.
18	C	The river and tributaries should be designated wilderness.
18	S	The Colorado River and tributaries should be evaluated for inclusion in the W&SR system. Accomplish through partnership with educational institution.
18	C	Pursue Wild & Scenic designation of tributaries to protect instream flows.
18	S	To preserve the resource, minimize crowding, and to strengthen the principles of wilderness management, the maximum party size should total 16 with no increase in the total allowable uses. Maximum trip length and number of launches should continue to vary across seasons.
19	C	Eliminate motorized equipment within the canyon wall including motorized rafts and helicopters.
19	C	Most importantly, NPS needs to use the Wilderness Act as a tool to better manage and protect the Park resource. Educate the public about the Wilderness Act. Make Wilderness designation for qualified parts to Grand Canyon a priority. Expand and tighten up inventory of LAC's for better resource protection.
20	C	Management of the Colorado River must provide for long-term preservation of the river resource and assure that this outstanding wilderness area will not be further deteriorated. Management decisions must be developed with input and approval from an informed public.
33	S	Prohibit motors in the river corridor. A compromise may be to reverse the current split - motors could be used from 9/15 - 12/15, but not the rest of the year. The Wilderness Act emphasizes non-motorized use, and should be respected in the CRMP update. Limit the group size for all trips. Emphasize policies limiting trail building and scout routes that diminish the wilderness experience.
36	S	Restrict motor season in the spring and gradually lengthen the motor restricted season until goal of elimination met. As an alternative, have summer the only motor season.
37	C	While we may agree that some limit of number of people on the river is essential, it is not at all clear what that limit should be or how it should be measured. Biological impact probably would not increase significantly over all even if the number of people per year were doubled or tripled. NPS, by failing to institute an aggressive off-limits campsite and attraction program, has ignored obvious restoration opportunities.
38	I	Impacts to the fragile beach environment in the canyon are visibly increasing. In spite of recent flood flows, dam operations have increased impacts due to erosion and many camping beaches are in bad shape.
39	S	Require all travelers to attend NPS orientation. Pay for this with fees from outfitters or other funds.

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39	I	Impacts on the river environment occur because orientation regulations are not followed by many canyon travelers ie trash, algae growth.
44	I	The NPS must manage as wilderness as stated in objectives and principles.
44	I	The CRMP should include ecosystem management; must contain a biological component not just socio-economic, recreation.
44	S	Develop and implement an ecosystem management-based plan including biological inventory and monitoring, protection of sensitive species, address groundwater
44	C	The NPS should pursue Wild & Scenic status for tributaries and portions of the Colorado River.
45	C	Contamination from outside the Park affects human health standards for the Colorado River and tributaries.
45	C	Regulate impacts on resource and users, do not regulate choice. Reward and recognize commercial operators for positive values: cleanliness, quiet, solitude, lights out.
45	I	Protect the park's natural quiet and solitude, wilderness status and management. Without protection from development and pollutants, we could lose the most basic and essential qualities the Canyon has.
47	I	There are too many people using the river and too much noise.
47	I	Stewardship is haphazard. There is not enough data on people and use. There is too little research on environmental and cultural issues.
47	S	Certify river users and leaders, require service by river users, and increase fees to support restoration. Research river users through the permitting process. Fund and give priority to archaeological and other studies to determine impacts.
49	S	A percentage of all entrance fees would go to the Tribes to establish a buffer zone, create a cultural awareness program, staff resource protection personnel, and improve park and Tribal relations.
49	C	Keep Lees Ferry historic district remote. Do not build a museum at Lees Ferry. Any building or museum should be at Marble Canyon and not at Lees Ferry. Money to fund a museum should come from private contributions, not the Colorado River Fund.
49	C	The NPS should cooperate with the tribes whose land border GCNP in establishing a buffer zone to protect the resource from development and other impacts.
51	C	Institute a threatened and endangered beach listing. Include special recommended practices which should be followed if present on such a beach.
53	C	Have comment cards available at the end of all river trips to help the NPS evaluate the resource, visitor experience, etc. I think the system now is excellent.
54	C	Reduce environmental impact to the lower gorge by not allowing upstream travel above the park boundary near Pierce Ferry.
64	S	No additional regulation of river traffic. Instead, educate commercial guides and private boaters to alleviate the problem. Encourage, rather than regulate, users to be flexible and considerate to avoid congestion.
64	C	There is crowding at attraction sites which reduces the quality of the visitor experience and is a stress on the resource ie multiple trailing.
65	C	NPS should follow management objectives of managing visitor use, development, and support services to protect the park's resources and values. Increasing the number of user days is not a long term solution to access conflicts and can negatively impact the resources.
65	S	Manage the river corridor as if it were a wilderness area, and use wilderness guidelines as management tool for setting user days etc. Use any new user fee for resource protection and restoration, not for intrusive developments along the river. Actively pursue designation of eligible sections of the Colorado River and its tributaries as part of the Wild & Scenic River System. Educate NPS personnel, river runners, and general public about the Wilderness Act.
65	C	I encourage the Park Service to do more research and gather facts (ie current resource monitoring data, river carrying capacity, visitor use and impacts etc) that can be freely available to the public so that informed decisions can be made related to managing the river.
66	C	Launch briefings should be given to commercial passengers as well as private. This could be done by a private company (rather than NPS or outfitters).
66	C	Review of science trip proposals should include private boaters. NPS should allow privates to outfit trips.
66	S	Manage according to Wilderness Act. Educate guides and outfitters on affects of wilderness and wild and scenic river management.
66	C	I do not support an increase in total number of people running the river.

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- 66 C Increase education of privates and hikers who use river campsites.
- 67 S Do not increase use levels.
- 67 I The carrying capacity is at or over limits set by the resource conditions or crowding.
- 68 C The paramount concern of the CRMP should be preservation of the resource. In light of the deteriorating conditions along the river corridor relating to human use, there should not be any increase in total allocation. Monitor conditions along the corridor and reduce total use-days if necessary to protect the Canyon resource.
- 68 S Fit user days to the availability of beaches rather than fitting beaches to a fixed user demand as is now done. Each year the capacity of beaches to accommodate users could be inventoried and this capacity would then guide the permit numbers for the year.
- 68 C The NPS should set commercial trip sizes and total numbers of rafters FIRST and then pursue maintenance of beach size, number and location to sustain the numbers especially if such an action places unreasonable demand on other resources.
- 69 S NPS should increase its financial commitment to resources and scientific study to at least 10% of its annual operating budget. Create a Federal Advisory Committee to provide recommendations on Park management supported by advice from scientific experts. Conduct a workshop with qualified experts to develop a conceptual model and a predictive/interactive model of ecosystem and visitor-related resources & processes. Rigorously analyze near-river springs and seeps before we lose those invaluable resources as rim groundwater withdrawal occurs.
- 69 C Initiate a comprehensive sociological program to document issues of visitor demography, expectation, satisfaction, and safety. Use these results in management of the river corridor. Develop an annual State of the River report which demonstrates scientific, managerial, and financial accountability. Submit the draft CRMP to the Adaptive Management Work Group for review. Make Grand Canyon an officially designated Long-term Ecological Research Site.
- 69 C The NPS needs to adopt a strong, pro-active, scientifically credible, and regionally-based approach to managing the river corridor's physical, natural and socio-economic resources and processes. NPS has repeatedly been criticized for failing to perform and use credible science in its management. The NPS should not perform research or monitoring activities. All scientific activities should be carefully overseen by qualified (PhD level) scientists.
- 69 S Work to obtain Potential Wilderness and Wild & Scenic designation for the river corridor and tributaries, grandfathering motorized river running.
- 69 C Actively focus on restoring endangered native species and habitats, especially species extirpated from the region. Keep a regional perspective in mind, including core reserve areas, buffer zones and corridors, and regional population issues. Implement a cowbird control program in the river corridor. Increase monitoring of tributaries to make sure non-native mainstream plant species do not invade. Adopt a non-native plant control program. Endorse and support the current restoration and rehabilitation approach. Advise river runners to avoid passing Nankoweap Creek in the morning, particularly in February/March so as to not disturb bald eagles.
- 69 S Fund the Science Center. Fund management techniques, restoration and projects etc that are in all the Park plans including the river corridor. Fund a comprehensive biological inventory and monitoring program.
- 69 S Develop a comprehensive scientifically credible biological inventory and monitoring program. Protect existing populations of species of special concern. Actively promote the reintroduction of extirpated species. Encourage research on the river ecosystem and its management. Produce annual state of the river resources report. Establish a science advisory panel. Promote and fund studies and projects to control non-native species.
- 69 I Wilderness, Potential Wilderness, and Wild and Scenic designation protect natural processes and preserve natural conditions. It is a higher level of protection of native species, biodiversity, and ecosystem processes than National Park status.
- 69 C GCNP has an historic opportunity to dedicate money from new fee programs to natural resources. Degradation of habitats and loss of species must be recognized and
- 69 I Adaptive ecosystem management requires clear definition of goals/objectives; good understanding of ecosystem components/processes; a proactive management approach with monitoring and research. Scientific credible information is required. We must move beyond discussion to planning the real steps to be taken for river corridor ecosystem management.
- 69 S Recognize the CRMP as the most comprehensive and specific document for ecosystem management of the Colorado River corridor. Create process with AMWG to implement adaptive ecosystem management. Have AMWG contribute to and review the CRMP to enhance its technical/scientific credibility. Develop a peer-reviewed River Ecosystem Mgmt program integrated with GC Monitoring and Research Center. Clearly establish hierarchy of CRMP and other Park plans.
- 69 I Guiding Principle ONE for the CRMP states that this plan is intended to be comprehensive, including resource management actions and considerations. Management plans and decisions about the Colorado River ecosystem already come from the Resource Management Plan, the Adaptive Management Work Group (AMWG) the CRMP, and an outdated Water Resource Management Plan. Conflict or overlap of Park and AMWG management recommendations and actions are likely in the absence of defined

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69	S	Actively pursue Wild & Scenic designation for eligible sections of the Colorado River and tributaries in Grand Canyon. Actively pursue Potential Wilderness designation for the river corridor and Wilderness designation for backcountry.
69	I	Resources of the Colorado River corridor are invaluable national treasures. The GCNP management objectives include the designation of special protective status for these resources. They should receive the highest protective status possible to ensure their protection.
69	S	Create a physical and biological inventory of the river corridor, tributaries, and desert landscape that surround it. Design and conduct a peer reviewed monitoring program integrated with the GC Monitoring & Research Center. Provide an annual public report on findings.
69	I	In order to effectively evaluate current and future management of the Colorado River corridor, a complete understanding of the processes and condition of resources is needed.
69	S	Actively pursue Wild & Scenic status for all eligible sections of the Colorado River and its tributaries. Actively pursue Wilderness or where appropriate, Potential Wilderness status for the River corridor, its tributaries, and surrounding desert landscape.
73	I	Invasion of non-native vegetation.
73	S	Expand effort to eliminate exotics. Enlist outfitter support to do voluntary service projects. If tamarisks are cut down, guides, visitors, NPS, etc., can pull-up seedlings while hiking in side canyons.